

September 5, 2017

Richard Sandzimier
Planning Official-Planning Division
City Council of Moreno Valley
14177 Frederick Street
Moreno Valley, California 92553

SUBJECT: Moreno Valley Logistics Center

Dear Mr. Sandzimier:

I am a long-time resident of Moreno Valley and over the past few years I have watched with great interest the city's efforts to aggressively pursue new businesses and development so we can bring more jobs to our city. I support this effort, but I want to make sure we minimize the impact any project would have on the environment. I am very concerned that yet again, we apply different standards in our city to similar projects with similar impacts. The city should apply the highest possible mitigation and be consistent in their application. The city is undermining its own credibility when the city is inconsistent in its own EIRs for similar projects with similar impacts. This is exactly the case with the Moreno Valley Logistics Center project (WLC).

Moreno Valley has established a high standard for logistics development in protecting its residents and the environment. Moreno Valley Logistics Center project should be expected and required to at least meet or exceed the same standards imposed by the city on the World Logistics Center.

I have scrutinized the mitigation measures imposed by the city on World Logistics Center and compared them to those proposed for the Moreno Valley Logistics Center project. The Moreno Valley Logistics Center project mitigations are entirely inadequate and are well below the WLC standards. I've listed a few areas where the project needs to improve its mitigation:

Setbacks

Staff is supporting the project's proposal to amend the Moreno Valley Industrial Area Plan to allow a reduction in the setback from adjacent residential areas, from 300 feet to 100 feet. That's a very large reduction, placing existing residences that much closer to the noise and pollution the project will bring. The rationale for the significant setback reduction is that the adjacent building was allowed to do it several years ago. Why is it acceptable to repeat the same mistake? The World Logistics Center project approved two years ago, was required by the city to a setback of 250 feet from the residential projects or 2½ times what is being proposed with this project. It was required as a minimum mitigation measure to

protect the residents adjacent to the proposed buildings at the WLC which have the exact same use and function. Moreno Valley Logistics Center should be required no less.

Solar power

Mitigation Measures on the World Logistics Center project require the construction and operation of roof-top solar systems large enough to power all “ancillary office space” in all warehouse buildings in the WLC in addition to requiring all roofs to be solar ready. Implementing roof-top solar systems will result in a substantial reduction in energy consumption and greenhouse gases. In contrast, the City does not require the construction of any solar energy systems in the Moreno Valley Logistics Center. The project is required only to provide some yet-to-be-determined portion of its building roofs that “could” accommodate the possible, future construction of such a system. There is no requirement that any solar power systems ever be installed anywhere in the project. Roof-top solar is a feasible mitigation measure to offset the energy demands and greenhouse gas emissions of a project. This project must make a commitment to roof-top solar systems to offset its impacts. In addition, the project did not explore all other feasible mitigations to reduce electrical use such as use of hybrid power, solar power water heaters, geothermal heat sinks, roof top ice units and other sustainable types of energy conservation.

Trucks

One of the most significant issues associated with logistics facilities is how diesel truck emissions are mitigated. Mitigation Measures applied to the World Logistics Center project required all trucks meet 2010 engine emission standards which are the highest standards available. If the city determined that it is viable at the World Logistics Center, it must do the same for this project? According to the City’s World Logistics Center EIR, the use of 2010 trucks is a feasible and will; produce significant reduction in truck emissions. In comparison, the Mitigation Measures applied to the Moreno Valley Logistics Center only requires that logistics operators “encourage” tenants to use 2010 trucks for only their own fleets, and imposes no requirement to monitor performance of this “requirement.” There are no requirements to restrict any third party or non-fleet trucks to a 2010 standard or monitor their access to the project. The project dismissed the use of 2010 trucks as something that would happen in 5 years anyway so no need to require on the project now. Requiring 2010 trucks with the project approval is a feasible mitigation measure and must be required.

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Tier 4 construction equipment

Emissions from construction equipment have a significant impact on the air quality and the environment. Tier 4 engines are currently the cleanest available technology in construction equipment and I know such equipment is readily available in the marketplace. Again, the City required the World Logistics Center project d to use all Tier 4 construction equipment, the Moreno Valley Logistics Center project is specifically allowed to substitute dirtier engines in place of Tier 4 equipment. Tier 4 equipment is a feasible mitigation measure and available for all types of equipment including the large earth movers. To say only a small percentage are available or is not financially feasible is inconsistent with the city's own conclusions and determination made in the WLC EIR. If it is feasible at the WLC in Moreno Valley projects, it must be feasible at this project. No financial feasibility has been provided in the projects EIR to arrive at the conclusion that it is not feasible.

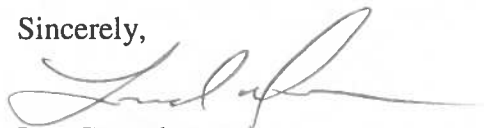
Fair-share contribution to mitigation of regional impacts

The project EIR indicates that impacts will occur to regional circulation facilities but indicates that "... there are no other feasible Mitigation Measures that would avoid or reduce the Project's cumulatively considerable traffic impacts that would have a proportional nexus to the Project's impact." The mitigation measures in the EIR for the World Logistics Center project contains a number of Mitigation Measures that mitigate precisely this issue. Requiring fair-share contributions is a feasible mitigation measure and must be implemented for this project.

These are but a few examples that I believe could be imposed on this project. Has the project agreed to use of all electric yard equipment and limited idling to 3 minutes and electrical hook ups at all dock doors. It would seem that if the City determined it feasible in one project it must be feasible. If we are going to support warehousing in our community, then let's do it to the highest standards possible so that we ensure these projects are mitigating the same for their impacts on the environment and our community.

The City Council needs to carefully consider the proposed Moreno Valley Logistics Center project and hold to the standards that they have set for other projects, like the World Logistics Center or even higher. I believe that the environmental laws require that the City apply all feasible mitigations to address a project's impacts. That has not been done here. The City needs to continue its efforts to establish Moreno Valley as a leader in environmental protection and sustainability, as well as a great place to do business which it has proven with other similar projects as the Skechers facility and the WLC.

Sincerely,



Leo Gonzalez

Moreno Valley Residents for Environmental Sustainability