

# MEMORANDUM

**TO:** Gabriel Diaz, Associate Planner  
City of Moreno Valley  
14177 Frederick Street  
Moreno Valley, California 92552

**FROM:** David Ornelas, Senior Project Manager

**DATE:** May 27, 2022

**RE:** Moreno Valley Trade Center – Revised Project Evaluation

T&B Planning, Inc. (T&B Planning) is the CEQA consulting firm that prepared the Environmental Impact (EIR) report for the proposed Moreno Valley Trade Center project (PEN19-0191, PEN19-0192, PEN19-0193, and PEN19-0234). The Project was presented to the Moreno Valley City Council on December 7, 2021, but was continued to allow the Applicant an opportunity to investigate modifications to the Project's design that may lessen its impact on the local environment. We understand that the Applicant has since made numerous changes to the design of the Project. At the request of the City of Moreno Valley Community Development Department, Planning Division, T&B Planning has prepared this memorandum to evaluate whether the changes to the Project would: 1) result in new significant environmental impacts that were not disclosed in the Draft EIR; or 2) result in significant impacts that are more severe than the impacts that were disclosed in the Draft EIR.

As supported by the discussion provided on the following pages, T&B Planning's determination is that the changes to the Project would neither result in a new significant environmental impact that was not previously disclosed nor increase the severity of a previously disclosed significant impact. Accordingly, there are no changes needed to the analysis or mitigation measures contained in the Draft EIR and re-circulation of the Draft EIR is not warranted according to the guidance set forth in Section 15088.5 of the CEQA Guidelines. Furthermore, no changes are needed to the analyses or mitigation measures contained in the Final EIR that is under consideration by the Moreno Valley City Council.

## **I. REVISED PROJECT DESCRIPTION**

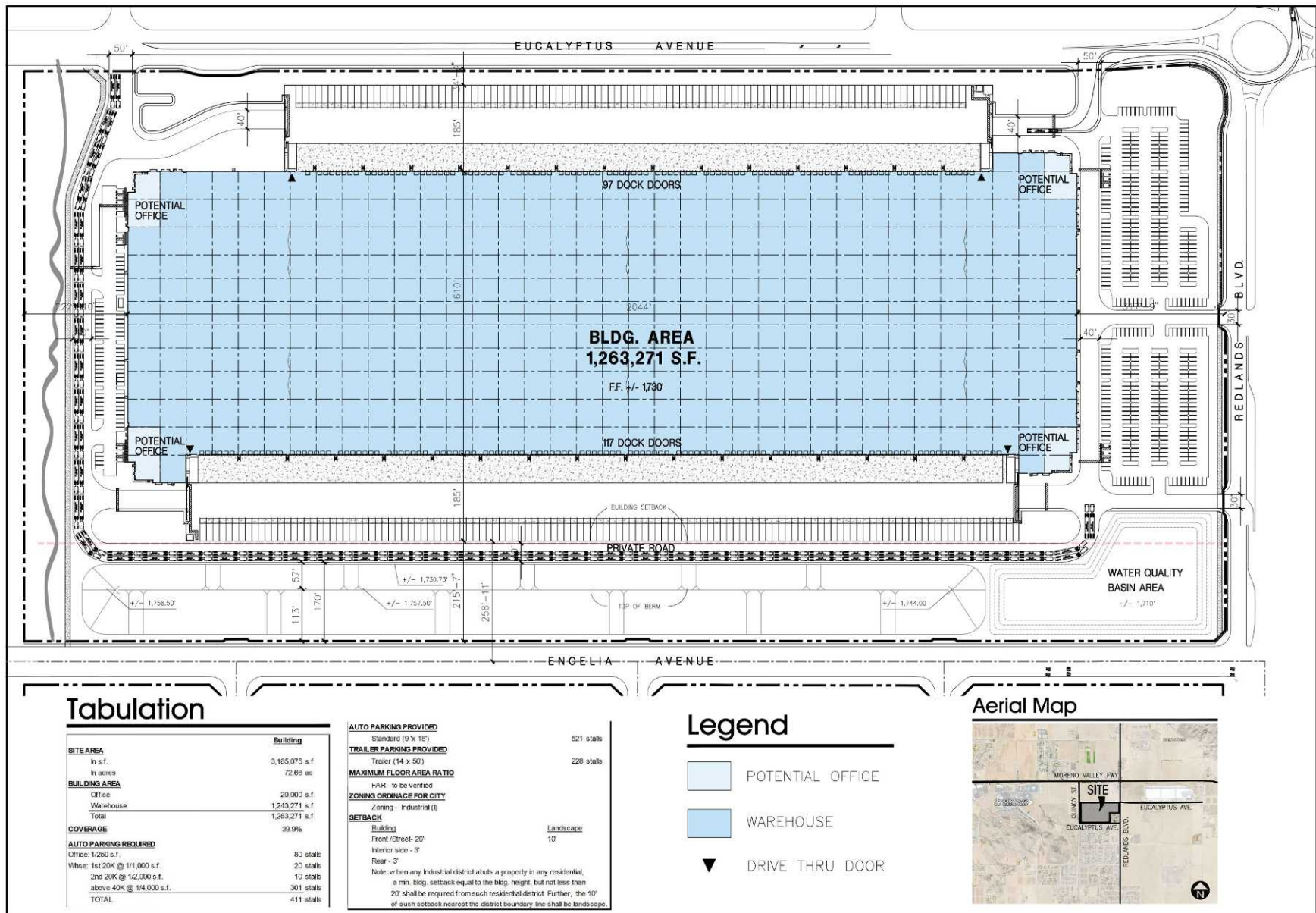
Section 3.0, *Project Description*, of the Draft EIR included a detailed description of the original Project proposal (hereinafter "Original Project"). The modifications incorporated into Project (hereinafter "Revised Project") are listed below. With the exception of the items listed below, all components of the proposed development and characteristics of proposed building's construction and operation listed in Section 3.0 of the EIR remain applicable to the Revised Project. Figure 1 illustrates the proposed site plan for the Revised Project.

- The Revised Project provides a light industrial building with approximately 1,263,271 square feet (s.f.) of interior floor area, which is a reduction of 65,582 s.f. from the original Project proposal.

- The Revised Project provides 97 loading docks on the north side of the building and 117 loading docks on the south side of the building, which is a reduction of seven (7) loading docks on the north side of the building and four (4) loading docks on the south side of the building, respectively, from the original Project proposal.
- The Revised Project provides 228 trailer parking spaces, which is 10 fewer trailer spaces than provided by the original Project proposal.
- The Revised Project provides 521 passenger vehicle parking spaces, which is 86 fewer passenger vehicle parking spaces than provided by the original Project proposal.
- The Revised Project eliminates all the driveways that were originally planned along Encelia Avenue. This will eliminate any vehicular ingress and egress along Encelia Avenue. [Note: Since the Revised Project will eliminate all vehicular driveways along Encelia Avenue, the following improvements required of the Original Project will not be needed for the Revised Project: 1) the installation of rubberized asphalt on Encelia Avenue; and 2) the installation of a traffic signal at the intersection of Encelia Avenue and Redlands Avenue.]
- The Revised Project provides a finished floor elevation of 1,732.25 feet above mean seal level (amsl), which is approximately 3.25 feet lower than the finished floor elevation provided by the original Project proposal (1,735.51 amsl). The reduction to finished floor elevation would reduce the perceived height of the building.
- The Revised Project provides a 35-foot-tall, solid earthen berm at the interface between the southern Project Site boundary and Encelia Avenue. The berm would be densely landscaped with trees, shrubs, and groundcovers.
- The Revised Project requires all trucks to access the Project site via Eucalyptus Avenue, thereby eliminating the truck access point from Redlands Boulevard from the original Project proposal.
- The Revised Project provides for the installation of traffic signals at the following locations: 1) on Eucalyptus Avenue at the proposed western driveway to the Project site; and 2) on Redlands Boulevard at the proposed northern driveway to the Project site.
- The Revised Project provides a water quality/detention basin at the southeastern corner of the Project site.

Similar to the Original Project, the Revised Project includes a site design concept for a fulfillment/e-commerce user. As disclosed in the Draft EIR, the fulfillment/e-commerce design concept is not proposed by the Applicant and is not under consideration for approval by the City; the fulfillment/e-commerce design concept is disclosed for informational purposes. All of the bulleted items listed above that were incorporated into the Revised Project also were incorporated into the fulfillment/e-commerce design concept with the exception of the following: 1) Zero (0) loading docks are provided on the south side of the proposed building; 2) 104 trailer parking stalls are provided (all are located on the north side of the building); and 3) 1,381 passenger vehicle parking stalls are provided. Figure 2 illustrates the conceptual site plan for the fulfillment/e-commerce option.





Source(s): HPA (01-31-2022)

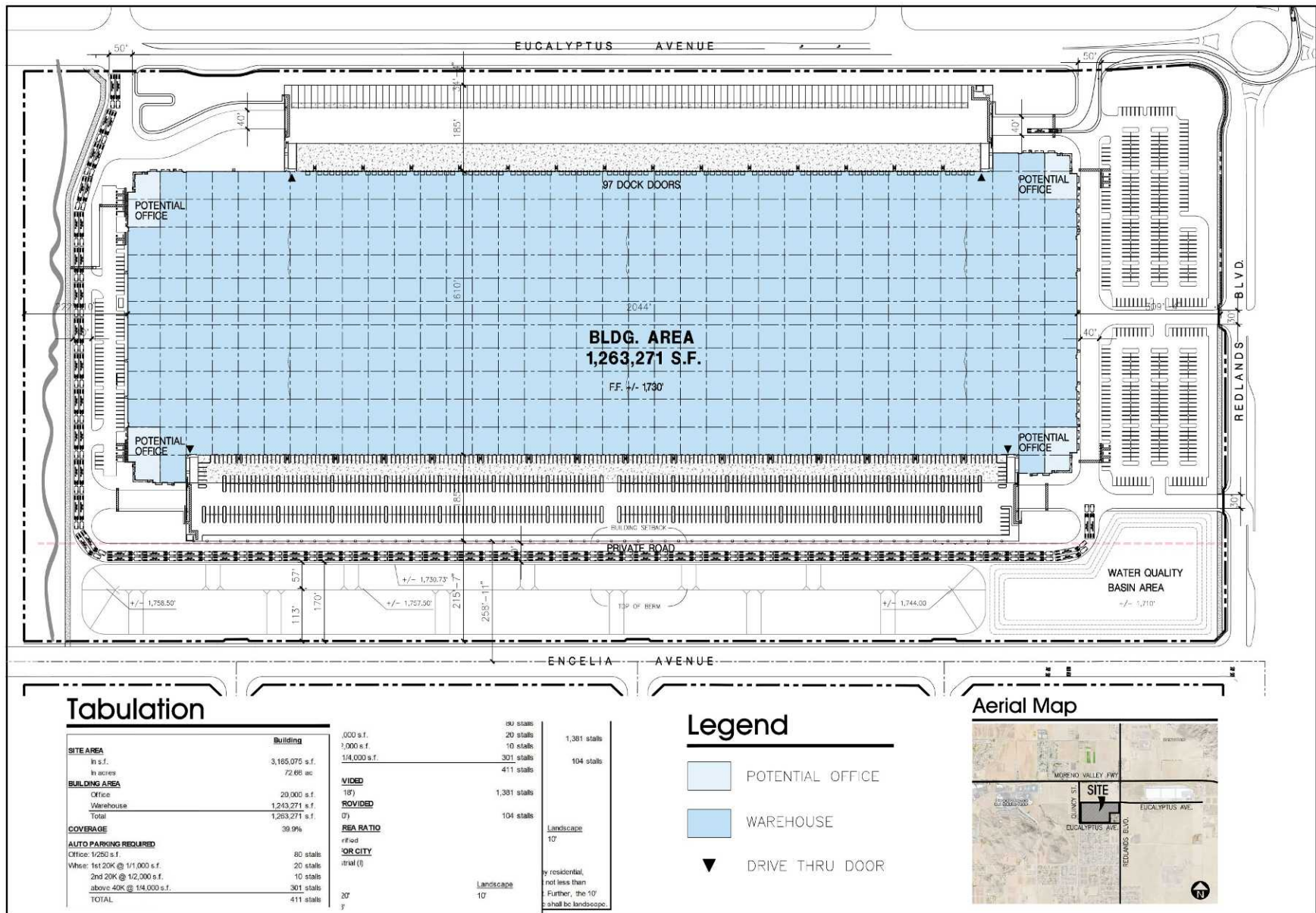
Figure 1



Not to Scale



Revised Project Site Plan



Source(s): HPA (01-31-2022)

Figure 2



Not to Scale



## Conceptual Fulfillment/E-Commerce Site Plan



## **II. REVISED PROJECT ENVIRONMENTAL IMPACT ANALYSIS**

This section provides a comparison of the environmental impacts that were disclosed in the Draft EIR against the potential direct, indirect, and cumulatively-considerable environmental impacts that could result from the planning, construction, and/or operation of the Revised Project.

### **A. Aesthetics**

The Draft EIR concluded that the Original Project would result in significant and unavoidable impacts related to scenic vistas. The Draft EIR disclosed that implementation of the Original Project would mostly or completely block views of Reche Canyon and the Badlands (and the San Bernardino Mountains beyond) as viewed from the segment of Encelia Avenue that abuts the Project site on the south (west of Shubert Street). Additionally, the Draft EIR disclosed that implementation of the Original Project would mostly or completely block scenic views of Mount Russell and its foothills from the segment of Eucalyptus Avenue that abuts the Project site on the north. The Draft EIR concluded the above-listed impacts also would occur under the Original Project's fulfillment/e-commerce development concept.

The Revised Project, including its revised fulfillment/e-commerce development concept, would not avoid the significant and unavoidable impact to scenic vistas that was disclosed in the Draft EIR. The Revised Project would continue to block views of Reche Canyon, the Badlands, and San Bernardino Mountains from the Encelia Avenue segment west of Shubert Street. Notwithstanding, the Revised Project would construct a earthen berm that is covered by densely planted landscaping which would provide a more complementary visual transition to the established residential community to the south of Encelia Avenue than the relatively open view into an industrial facility offered by the Original Project. Although the perceived height of the Revised Project would be approximately three (3) feet shorter than the Original Project, due to the lowering of the proposed finished floor elevation, this change would have no effect on significant impacts to scenic views of Mount Russell and its foothills from Eucalyptus Avenue.

Other impacts to aesthetics would be identical under the Revised Project to those disclosed in the Draft EIR: 1) The Project site does not contain scenic resources and is not located within the viewshed of a scenic highway; therefore, the Revised Project would not result in the loss of scenic resources on the Project site; 2) The Revised Project would not conflict with applicable regulations governing scenic quality; and 3) The Revised Project would not introduce any design features that produce substantial light or glare and the Revised Project would be required to comply with the Moreno Valley Municipal Code requirements related to artificial lighting to preclude substantial light trespass and sky glow.

Consistent with the information disclosed in the Draft EIR, the Revised Project's effect on aesthetics would be significant and unavoidable. The Revised Project would not result in impacts to aesthetics that were not previously disclosed in the Draft EIR.

### **B. Air Quality**

The Draft EIR concluded that construction of the Original Project would result in less than significant impacts (both direct and cumulative) from regional and localized criteria air pollutant emissions. The Revised Project would

result in construction activities across the entire Project site and would utilize similar construction equipment (and in similar quantities) as disclosed in the Draft EIR for the Original Project. Therefore, the peak daily construction activities and air pollutant emissions for the Revised Project, including under its revised fulfillment/e-commerce development concept, are expected to be similar to the levels disclosed in the Draft EIR despite the Revised Project resulting in the construction of a smaller building. Based on the foregoing information, the Revised Project would not result in construction-related regional or localized air quality impacts that were not disclosed in the Draft EIR. It should be noted that the Draft EIR identified several MMs for construction activities to ensure compliance with State and local air quality regulations (i.e., MMs 4.2-1 through 4.2-4) even though construction-related air quality impacts would be less than significant. MMs 4.2-1 through 4.2-4 would continue to apply to the Revised Project.

The Draft EIR disclosed that operation of the Original Project would result in a significant environmental impact (on a direct and cumulative basis) from nitrogen oxide ( $\text{NO}_x$ ) emissions and a less than significant impact from volatile organic compound (VOC), carbon monoxide (CO), sulfur oxide ( $\text{SO}_x$ ), and particulate matter ( $\text{PM}_{10}$  and  $\text{PM}_{2.5}$ ) emissions. MMs were required to address the significant impact from operational  $\text{NO}_x$  emissions (i.e., MMs 4.2-5 through 4.2-11); however, the Draft EIR disclosed that these MMs would not be adequate to reduce the operational  $\text{NO}_x$  impact to a less than significant level and no additional feasible MMs were available to avoid or further lessen the impact. The consulting firm Urban Crossroads conducted an analysis of emissions that would result from operation of the Revised Project. The operational analysis of the Revised Project found that operation of the Revised Project, including its revised fulfillment/e-commerce development concept, would reduce emissions of all criteria pollutants below the levels disclosed in the Draft EIR but the emissions reductions would not be sufficient to avoid the significant and unavoidable direct and cumulative impact from  $\text{NO}_x$  emissions that was disclosed in the Draft EIR (Urban Crossroads, 2022a, p. 3; Urban Crossroads, 2022b, p. 3). The Revised Project would be required to comply with all mitigation measures from the Draft EIR that address operational  $\text{NO}_x$  emissions. Based on the information above, operation of the Revised Project would not result in regional air quality impacts that were not disclosed in the Draft EIR.

The Draft EIR disclosed that operation of the Original Project would generate less than significant localized air pollutant emissions during operation – both localized criteria pollutant emissions and localized diesel particulate matter emissions. Because the Revised Project would feature less intensive building operations – due to a smaller building size and reduced heavy truck activity – operation of the Revised Project, including its fulfillment/e-commerce development concept, would result in localized criteria pollutant emissions that are less than what was disclosed in the Draft EIR and, also, would result in health risk impacts from diesel particulate matter emissions that are lower than what was disclosed in the Draft EIR (Urban Crossroads, 2022a, p. 5; Urban Crossroads, 2022b, p. 5). Based on the information above, operation of the Revised Project would not result in localized air quality impacts that were not disclosed in the Draft EIR.

Like the Original Project, the Revised Project would generate odors during short-term construction activities (e.g., diesel equipment exhaust, architectural coatings, asphalt) and long-term operation (e.g., diesel exhaust). However, similar to the Original Project, these odors would occur intermittently, be of short-term duration, and would not be substantial. Long-term operation would not create objectionable odors affecting a substantial number of people and impacts would be less than significant with compliance with mandatory regulatory requirements. The Revised Project would not result in new significant impacts related to air quality than those previously disclosed in the Draft EIR.



As demonstrated by the preceding analysis, construction and operation of the Revised Project would result in similar or reduced impact to air quality when compared to the Original Project. Implementation of the Revised Project would not result in direct or cumulative air quality impacts that were not disclosed in the Draft EIR.

### **C. Biological Resources**

The Revised Project would have an identical physical development footprint as the Original Project and, thus, the Revised Project would result in biological resources impacts that are the same as those disclosed in the Draft EIR. Therefore, the information disclosed in the Draft EIR related to biological resources impacts remains applicable to the Revised Project and the Revised Project would not result in impacts that were not previously disclosed in the Draft EIR. All mitigation measures (MMs) provided by the Draft EIR to address biological resources impacts (i.e., MMs 4.3-1 through 4.3-3) would be required for the Revised Project. With application of required mitigation, the Revised Project would result in less than significant impact to biological resources, which is the same conclusion drawn by the Draft EIR.

### **D. Cultural and Tribal Cultural Resources**

The Revised Project would have an identical physical development footprint as the Original Project, although the Revised Project would have deeper excavations than the Original Project due to the lowering of the finished floor elevation. Implementation of the Revised Project would have no impact to known pre/proto-historic or historic archaeological resources or tribal cultural resources but would have the potential to uncover masked or buried resources during construction, which are the same conclusions made by the Draft EIR. The Revised Project would be required to comply with MMs 4.4-1 through 4.4-6 from the Draft EIR, which provide a protocol for the investigation and protection or removal of cultural and tribal cultural resources in the event such resources are discovered during construction. With application of the required mitigation, the Revised Project would result in less than significant impacts to cultural and tribal cultural resources. Based on the preceding analysis, the Revised Project would not result in impacts to cultural and/or tribal cultural resources that were not disclosed in the Draft EIR.

### **E. Energy**

The Draft EIR concluded that the Original Project would not result in inefficient, wasteful, or unnecessary consumption of energy resources and, thus, would result in a less than significant environmental impact. The Revised Project would feature less intensive building operations than the Original Project – due to a smaller building size and reduced heavy truck activity – thus, operation of the Revised Project, including its revised fulfillment/e-commerce development concept, would consume less electricity, natural gas, and transportation fuels than the levels disclosed in the Draft EIR (Urban Crossroads, 2022a, p. 4; Urban Crossroads, 2022b, p. 4). Because the Revised Project would consume less energy resources than the Original Project, implementation of the Revised Project would not result in environmental impacts related to energy use/consumption that were not disclosed in the Draft EIR.

### **F. Geology & Soils**

The Revised Project would have an identical physical development footprint as the Original Project, although the Revised Project would have deeper excavations than the Original Project due to the lowering of the finished floor

elevation. The Revised Project would have a less than significant impact related to soil erosion during its construction and operation phases due to mandatory compliance with federal, State, and local water quality standards – this is the same conclusion drawn by the Draft EIR. The Revised Project would be required to comply with the same regulatory and design requirements that were disclosed in the Draft EIR to preclude substantial hazards associated with seismic ground shaking and the Project site's geologic conditions/characteristics. The Revised Project would result in less-than-significant impacts related to geology and soils hazards, which is the same conclusion drawn by the Draft EIR.

As disclosed in the Draft EIR, the Project site is underlain by soils with a high sensitivity for paleontological resources; therefore, the Revised Project has the potential to impact paleontological resources (the Original Project had the same impact). All MMs provided by the Draft EIR to address paleontological resources impacts (i.e., MMs 4.6-1 through 4.6-4) would be required for the Revised Project. With application of required mitigation, the Revised Project would result in less than significant impacts to paleontological resources, which is the same conclusion drawn by the Draft EIR.

Based on the foregoing analysis, the Revised Project would not result in geology and soils impacts that were not already disclosed in the Draft EIR.

#### **G. Greenhouse Gas Emissions**

The Draft EIR disclosed that implementation of Original Project would result in a cumulatively considerable environmental impact from greenhouse gas (GHG) emissions. MMs were required to reduce GHG emissions from the Original Project (i.e., MMs 4.2-5 through 4.2-11); however, the Draft EIR disclosed that these MMs would not be adequate to reduce the GHG impact to a less than significant level and no additional feasible MMs were available to avoid or further lessen the impact. Urban Crossroads performed an analysis of the GHG emissions that would result from the Revised Project. The analysis found that implementation of the Revised Project, including its fulfillment/e-commerce development concept, would reduce GHG emissions below the levels disclosed in the Draft EIR but the emissions reductions would not be sufficient to avoid the significant and unavoidable cumulative impact from GHG emissions that was disclosed in the Draft EIR (Urban Crossroads, 2022a, p. 3; Urban Crossroads, 2022b, p. 3). The Revised Project would be required to comply with all mitigation measures from the Draft EIR that address GHG emissions. Based on the information above, operation of the Revised Project would not result in a GHG emissions impacts that were not disclosed in the Draft EIR.

#### **H. Hazards & Hazardous Materials**

The Draft EIR concluded that the Original Project would not create a significant hazard to the public or the environment related to the use, handling, storage, and/or transport of hazardous materials. Notwithstanding, the Draft EIR included several MMs (i.e., MM 4.8-1 through 4.8-3) to ensure compliance with applicable federal, State, and local regulations addressing hazardous materials during demolition and construction activities on the Project Site. The Revised Project requires similar construction activities/equipment as the Original Project would operate the same land uses on the Project site as the Original Project and, therefore, would have a similar, less than significant impact related to hazards and hazardous materials. The Revised Project would be required to comply with MMs 4.8-1 through 4.8-3. The Revised Project would not result in hazards and hazardous materials impacts that were not previously disclosed in the Draft EIR.



## **I. Hydrology & Water Quality**

The Draft EIR concluded that the Original Project would result in less than significant impacts to hydrology and water quality and no mitigation was required. The Revised Project would be required to implement a Storm Water Pollution Prevention Program during construction and a Water Quality Management Plan during operation to ensure that stormwater runoff does not contain substantial pollutant concentrations. The Revised Project would change the design of the Original Project's on-site water quality/detention basin system; however, the hydrology analysis performed by Thienes Engineering demonstrates that the Revised Project, including its e-commerce development concept, would not generate a volume or rate of stormwater runoff discharge that would exceed existing (i.e., pre-development) runoff volumes or rates or create a flood hazard downstream (Thienes, 2022a; Thienes, 2022b). The Revised Project would not result in impacts to hydrology and water quality that were not disclosed in the Draft EIR.

## **J. Land Use & Planning**

The Draft EIR concluded that the Original Project would not physically divide an established community or result in significant land use and planning conflicts in the context of compliance with applicable environmental plans, policies, and regulations. Because the Revised Project would have an identical development footprint as the Original Project and proposes the same land use with a similar (but reduced intensity) development plan than the Original Project, the information disclosed in the Draft EIR and the conclusions drawn by the Draft EIR related to potential land use and planning impacts remain applicable to the Revised Project. The Revised Project would not result in impacts to land use and planning that were not already disclosed in the Draft EIR.

## **K. Noise**

The Draft EIR concluded that the Original Project would not generate noise or vibration during construction that exceeded the standards established by the Moreno Valley Municipal Code. The Revised Project would result in construction activities across the entire Project site and would utilize similar construction equipment (and in similar quantities) as disclosed in the Draft EIR for the Original Project. Therefore, the peak daily construction activities and resulting construction noise and vibration for the Revised Project, including under its revised fulfillment/e-commerce development concept, are expected to be similar to the levels disclosed in the Draft EIR despite the Revised Project resulting in the construction of a smaller building. Based on the foregoing information, the Revised Project would not result in construction-related noise or vibration impacts that were not disclosed in the Draft EIR.

The Draft EIR also concluded that operation of the Original Project would not generate noise or vibration that exceeded the standards established by the Moreno Valley Municipal Code. The Revised Project would reduce the intensity of operations on the Project site, as compared to the Original Project, due to a reduction of building area and heavy truck activity (which results in a concomitant reduction in loading/unloading activity), which would result in lower operational noise and vibration levels than the Original Project. Based on a noise analysis performed by Urban Crossroads, the reduced intensity of operations on the Project site coupled with addition of the 35-foot-tall earthen berm along the southern Project site boundary would allow the Revised Project, including its fulfillment/e-commerce development concept, to achieve operational noise levels that are substantially lower than the Original Project – and lower than existing local ambient noise levels (Urban Crossroads, 2022c, pp. 1-2). For comparison, the established residential community located south of Encelia Avenue would experience noise

levels from the Revised Project that are approximately 56% less than the noise levels disclosed in the Draft EIR for the Original Project (ibid.). Accordingly, the Revised Project would not result in operational noise or vibration impacts that were not previously disclosed in the Draft EIR.

#### **L. Transportation**

The Draft EIR concluded that the Original Project would not conflict with local transportation plans and policies and, also, would generate a less than significant amount of vehicle miles traveled (VMT). The Revised Project, including its revised fulfillment/e-commerce development concept, would result in less passenger vehicle and heavy truck traffic than disclosed in the Draft EIR due to operation of a smaller (Translutions, 2022a). In addition, the Revised Project would result in different traffic patterns than disclosed in the Draft EIR due to the elimination of all access points to Encelia Avenue (which would eliminate all passenger vehicle traffic from the Project Site onto Encelia Avenue) and the elimination of a heavy truck access point on Redlands Boulevard (which would funnel all heavy trucks to the proposed driveways on Eucalyptus Avenue). According to analyses performed by the consulting firm Translutions, the revised traffic patterns of the Revised Project would not conflict with any local transportation plans and policies (Translutions, 2022b; Translutions, 2022c). Additionally, Translutions determined that the Revised Project would result in similar, less than significant impacts from VMT as the Original Project (Translutions, 2022a). Based on the information above, the Revised Project would not result in transportation impacts that were not previously disclosed in the Draft EIR.

#### **M. Utilities & Service Systems**

The Draft EIR concluded that the Original Project would result in less than significant impacts to utilities, including to wet utilities (water and sewer), storm drain facilities, dry utilities (electricity), and to public service systems, including water supply, sewer treatment, and solid waste disposal. Because the Revised Project would provide a smaller building than the Original Project (and would result in fewer employees working on the Project site), the Revised Project would have a lower demand for public utilities and service systems than the levels disclosed in the Draft EIR. Implementation of the Revised Project would not result in impacts to utilities and services that were not disclosed in the Draft EIR.

#### **REFERENCES**

Thienes Engineering, 2022a. Preliminary Hydrology Calculations Moreno Valley Trade Center: Option 1 High Cube Logistics Site Plan. April 5, 2022.

Thienes Engineering, 2022b. Preliminary Hydrology Calculations Moreno Valley Trade Center: Option 2 E-Commerce/Fulfillment Site Plan. April 5, 2022.

Translutions, 2022a. Moreno Valley Trade Center Trip Generation Comparison. April 22, 2022.

Translutions, 2022b. Moreno Valley Trade Center Traffic Impact Analysis Warehouse Scenario. April 9, 2022.

Translutions, 2022c. Moreno Valley Trade Center Traffic Impact Analysis E-Commerce Scenario. April 9, 2022.





Urban Crossroads, 2022a. Moreno Valley Trade Center (Warehouse Scenario) Air Quality, Greenhouse Gas, And Health Risk Assessment Evaluation. April 25, 2022.

Urban Crossroads, 2022b. Moreno Valley Trade Center (E-Commerce Scenario) Air Quality, Greenhouse Gas, And Health Risk Assessment Evaluation. April 25, 2022.

Urban Crossroads, 2022c. Moreno Valley Trade Center Warehouse Noise Summary. April 27, 2022.