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**To:** Mark Gross

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**Subject:** OFFICIAL COMMENTS FOR DEIR FOR RORLD LOGISTICS CENTER "W

**Attachment(s):** 0

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We are opposed to the WORLD LOGISTICS CENTER PROJECT for the following rea

Chapter 4.3 in Air Quality Section Pg 4.3-36 states that Dr. James Enstrom b the risk from diesel PM is exaggerated (2008), However, <[http://oehha.ca.gov/public\\_info/facts/pdf/diesel4-02.pdf](http://oehha.ca.gov/public_info/facts/pdf/diesel4-02.pdf)> [http://oehha.ca.gov/public\\_info/facts/pdf/diesel4-02.pdf](http://oehha.ca.gov/public_info/facts/pdf/diesel4-02.pdf) states that diesel health impacts are negative and our city, in or protect our health and welfare owes it to the residents to use caution and prote negative development impacts, thus this project should not be approved.

Chapter 4.3 in Air Quality Section Pg 4.3-39 says that the localized significar analysis in Scenario 1 having 2012 for phase 1 buildout is exaggerated because diesel engines, so this presents a worst case scenario. Further Scenario 2 state for phase 1 occurs in 2017 and and phase 2 occurs in 2022 and impact of dies less because of the assumption that the future diesel fleets will have less emiss resulting impacts in the air. California has postponed the more stringent diesel standards <<http://www.dailyfinance.com/2010/12/17/california-postpones-i-emission-standards/>> <http://www.dailyfinance.com/2010/12/17/california-postpones-i-emission-standards/> and <[https://www.cmca.com/pdf/maintenance/CTA\\_CARB\\_GUIDE\\_04.12.pdf](https://www.cmca.com/pdf/maintenance/CTA_CARB_GUIDE_04.12.pdf)> [https://www.cmca.com/pdf/maintenance/CTA\\_CARB\\_GUIDE\\_04.12.pdf](https://www.cmca.com/pdf/maintenance/CTA_CARB_GUIDE_04.12.pdf) and although phasing has started, I believe, it vari truck, model, standard, etc. <<http://www.truckline.com/AdvIssues/Environment/Documents/California%20Tractor-Trailer%20Regulation.pdf>> <http://www.truckline.com/AdvIssues/Environment/Documents/California%20Tractor-Trailer%20Regulation.pdf>

there will still be a period of time before all the appropriate equipment or upgrades are on the roads and running, and in the meantime the diesel particulate matter will increase in Moreno Valley's area and negatively impact the health of residents, our children and elderly, thus this project should not be approved.

Chapter 4.3 in Air Quality Section Pg 4.3-49, Section 4.3.6.1: Implementation of proposed project has the potential to conflict with implementation of the SCAQMD AQMP. This project has the likelihood of adding to air quality degradation and quality violations which is not acceptable to an area that currently has some of the best air quality in the nation per our SCAQMD <<http://www.pe.com/local-news/topics/environment-headlines/20121221-moreno-valley-district-raps-warehouse-plans>>  
<<http://www.pe.com/local-news/topics/topics-environment-headlines/20121221-moreno-valley-district-raps-warehouse-plans.ece>>

Mitigation in a vacuum is no in name only. Moreno Valley residents deserve a high quality of life and that includes air that does not contribute to asthma in all age groups, our most vulnerable and a city council that understands that their job is to protect the quality of life in our city and that promising cheap jobs that may or may not make them not doing their job.

This project is being viewed alone and not in conjunction with the accompanying development of numerous other warehouses that are now active in Moreno Valley. Such, all the estimated air quality impacts and accompanying mitigations measures are inadequate. Refer to SCAQMD letter dated 12-14-12 to John Terrel, Planning Director, Community & Economic Dev Dept. for the City of Moreno Valley.

There are many reasons this project should not be approved, and the Press Enterprise editorial of 1-6-13 says it best, <<http://www.pe.com/opinion/editorials-headlines/20130106-editorial-restrict-air-pollution-from-moreno-valley-warehouses.ece>>  
<[www.pe.com/opinion/editorials-headlines/20130106-editorial-restrict-air-pollution-from-moreno-valley-warehouses.ece](http://www.pe.com/opinion/editorials-headlines/20130106-editorial-restrict-air-pollution-from-moreno-valley-warehouses.ece)>

P-E Editorial 1-6-13

Moreno Valley needs to take a more stringent approach to air pollution from wa

traffic than the city now proposes. A city contemplating a vast expansion of warehouse space should take every possible step to curb diesel emissions — for the good of residents and the region.

The South Coast Air Quality Management District says that Moreno Valley is pushing forward with warehouse projects without doing enough to protect air quality. The district urged the city to put stronger restrictions on the proposed 1.5 million-square-foot Business Center, slated for land east of Heacock Street near March Air Reserve Base. The project is still moving through the city's approval process. The district wrote the city after the project's environmental report in November rejected the agency's suggestions to limit pollution from truck traffic as impractical.

Air quality should be a fundamental concern for any city proposing to become a logistics center, as Moreno Valley is. Warehouses are at best a mixed proposition for a city grappling with heavy traffic congestion in a region with some of the dirtiest air in the nation. Exhaust from diesel engines is a primary source of pollutants, particularly fine particulate pollution linked to a variety of heart and lung ailments, including cancer and death. Not surprisingly, fears of deteriorating air quality are one of the biggest reasons for public opposition to city warehouse projects.

So Moreno Valley should address that issue aggressively, especially given the city's plans for millions more square feet of warehouse space — including one proposal for a new warehouse complex equal in size to more than 700 football fields. If the project is approved, strict air quality requirements from the start could help the city avoid becoming a lesson in pollution-spewing planning.

Yet the city's response to the air quality regulators' concerns hardly builds public confidence that the city is carefully considering its rush to build warehouses. The city said the city could, for example, require trucks serving the warehouse to meet tighter emissions standards, or create a plan to phase in newer, cleaner trucks as quickly as possible. The city could also require warehouse tenants to apply for government incentives to retrofit or replace older trucks, among other steps. The city's reaction: Moreno Valley has no control over truck emissions, which fall under state and federal law. The city says the air quality agency's proposed solutions are infeasible.

Other local governments do not share that view, however. The air district points to examples in San Bernardino and Mira Loma, where planners imposed such conditions on warehouse proposals. Those examples suggest that the issue is not legality and feasibility, but whether it will.

And council members' complaints that the air quality district is unfairly picking on Moreno Valley miss the point. The real issue is whether the city is acting responsibly in pushing forward with warehouse development. The city envisions a massive logistics hub, and yet would anyone would complain when officials wave off concerns about pollution from that hub? Moreno Valley should not have to sacrifice air quality for the city's future. South California has managed to greatly improve its air even as the region's economy

but not by scrimping on pollution control measures. Moreno Valley can grow and have everything possible to protect residents' health and the region's air — but not if it takes a hands-off approach to diesel pollution.

Moreno Valley would do well to look at California Cities with high environmental quality and high quality of life standards as both go together, much as the City of Berkeley has stated via

"Goal #3: Protect local and regional environmental quality: Without a healthy environment, the high quality of life in Berkeley will be degraded for present inhabitants and future generations. This Plan emphasizes the protection of the environment, both locally and regionally. It addresses City programs and actions, the importance of regional standards and the importance of the actions of the individual in day-to-day decisions on the environment."

Improve Air Quality and Conserve Resources. Air quality in the Bay Area is threatened by increased emissions from motor vehicle use and other sources. The City Council has adopted the Resource Conservation and Global Warming Abatement Plan. Many policies and programs are incorporated into the General Plan. The Plan's Transportation Element contains policies to reduce automobile use and the Land Use Element encourages housing development along transit corridors to reduce the need for automobiles. <<http://www.ci.berkeley.ca.us/contentdisplay.aspx?id=488>> <http://www.ci.berkeley.ca.us/contentdisplay.aspx?id=488>

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