

April 7, 2013

TO: City of Moreno Valley Planning Dept, Attn: Mr Mark Gross at [markg@moval.org](mailto:markg@moval.org)  
City Hall, 14177 Frederick St, Moreno Valley, CA 92552

FROM: Michael McCoy, 10304 Crossing Green Cir, Moreno Valley CA 92557 at  
[mikeandnan@mac.com](mailto:mikeandnan@mac.com)

SUBJECT: Official Comments for the Draft Environmental Impact Report (DEIR) for the World Logistics Center (WLC) proposed for Moreno Valley, State Clearinghouse No. 2012021045

## **A. Opening General Comments on Overall Project:**

Thank you, City Council for allowing others and me to comment on the environmental impacts of the proposed World Logistics Center in Moreno Valley. The EIR document is generally adequate although I will point out some important omissions and weak spots. The consultants the developer hired under City advisement are generally some of the best in the business and I respect their hard work. However, the citizens also should have an equal chance to voice their concerns and try to get the City Council to slow down the review process and listen to the people. The Mayor recently admitted that "trust" was a major problem between the people and elected officials that cried out to be remedied. If the WLC is given a complete and total airing of all views and allows all questions to be proposed by both the developer and project opponents it would go a long way to re-establishing that trust. Steamrolling a project through does not bide well for trusting the Council and their motives.

How the City deals with the vast list of unavoidable and severe environmental impacts the project would generate will illustrate that level of trust and of belief in the valid concerns of the general public. Will the City require even more mitigation? Will the project be declined in total and the developer shown the door? Will the City leaders go forth with the potentially divisive "overriding considerations" strategy, under CEQA to force the project on the community? Would the City put the project up to a vote of the people? Deep questions need supportable answers and so far I have mostly heard a lot of concealment and avoidance of unfriendly opinions from City Hall.

It's no secret that I am an opponent of the World Logistics Center as now envisioned by the developer and its cheering section on the City Council. My comments in the following pages show that I am invoking much of the data and predictions found in this Draft EIR as glaring proof that the WLC is totally inappropriate for this particular location, for Moreno Valley and for the entire Inland Region. The developer acquired some relatively cheap land and is maneuvering the approval process to its liking and claiming it will be a 'jobs bonanza' despite a track record to the contrary. The Skechers project brought insignificant new jobs to Moreno Valley's citizens and indeed now only employs about 160 workers compared to the 2,000 originally promised.

During these forthcoming debates over approval of the project, I propose a moratorium on any job predictions for the WLC. Neither the City, the developer or its consultants can guess years ahead what tenants will build there, the nature of their logistics and warehouse operations, or at what future date they will be up and running. Final build out is predicted for either 2022 or 2035 in the EIR. Any such job numbers for that far ahead are pure fiction.

The World Logistics Center is in my opinion, also doomed to failure in this location because it faces significant loss of business potential due to forthcoming shifts in global goods movement as a result of the long-forecasted widening of the Panama Canal. No matter what is proposed for Moreno Valley, factors far beyond our control will constrain and reduce the need for west coast warehouses. In a once-in-a-lifetime paradoxical shift due to the Canal, West Coast ports will lose their competitive edge and regional warehouses could be left vacant.

The WLC, especially, will be "left behind" as a desirable freight staging area as goods movement shifts from the Ports of LA and Long Beach to Mexican, Gulf Coast and East Coast harbors closer to cargos' ultimate destination. The other entry ports are usually cheaper to operate, also. Recent LA Times news articles indicate LA-based officials are now concerned and local California ports, railroads and trucking services are fighting back. However, improved rail and air facilities plus more robust freeway and cargo transferring resources exist elsewhere, all of which are lacking at the WLC site. Better accessed warehouse complexes in Palmdale, Victorville and other desert locations that have plenty of rail, air, interstate freeway and room for innovative cargo-handling facilities, including "high cube" design will hang on to whatever logistics business remains tied to the West Coast.

## **B. Comments pertaining to Section 1.0 Executive Summary:**

### 1.3 Public Involvement

In some respects the City as Lead Agency has not been as pro-active with encouraging and incorporating expressions of concern and alternative views from the public on the WLC as should be expected with a project as important and controversial as this is. In my opinion, the City has breached the public trust by only barely complying with the legal requirements under CEQA and has avoided or shunned any kind of fair and equal debate. This "doing as little as possible" or "meeting the letter of the law and nothing more" attitude has damaged the integrity of the Council, the review process by not having a true dialog addressing the concerns of the General Public.

All meetings, so-called "forums" and presentations have been almost totally one sided and favoring only the City Council's position regarding the WLC, being one of unwavering support for it. Project opponents have been limited to brief three-minute speeches at meetings and face other limited opportunities. For example, no procedure was provided by the City Council for the public to comment on or ask questions to

taxpayer-paid presenters at recent forums, impeding any fair assessment of all sides of the issue in a public meeting.

When I asked Mayor Owings after the Feb. 26 "Forum" if there would be a future opportunity to ask questions and comment on his statements and those of the consultants made that evening, he told me to e-mail him and that he was also planning for a more genuine question and answer forum soon... but I have never heard back or seen any announcements thereto. Project opponents have had to organize and operate their own meetings and programs, which, curiously, were attended by City staff and the WLC developer.

Even the City's internet presence for this Draft EIR seemed buried in the many diverse sections of the municipal website. Due to its controversy and public interest, perhaps it should have been tagged somehow on the home page or directly in the Planning Dept section. Search line entries for "DEIR" and other guesses by the public usually failed because the user didn't enter the proper arcane jargon. Oh, no laws were broken and maybe this wasn't on purpose and I'm certain the tech-savvy among us had no serious issues, but it's just another example of the City sometimes unfairly making it tough on opponents of the project while it smooths the way for the developer.

#### 1.4 Areas of Controversy and Issues to be Resolved

Some of the points I raised following the March 2012 Notice of Preparation (NOP) Hearing were not mentioned in this section that claims to be a fair summary. The usually highly-thought-of and reputable LSA staff must have considered some topics either not controversial or not subject to comment or responses under CEQA, including:

- A conceptual site plan showing generalized street network and building placement. Later on I did find a basic street network but not any buildings.
- Air Quality emission impacts beyond just the "nearby residential" area.
- Alternative fuels as potential mitigation to excessive pollutant emissions.
- Review of WLC's position in the real-world global logistics and goods movement picture, especially with respect to the widening of the Panamá Canal.

Most of these topics are covered in the detailed portions of the EIR or in the appendices but not including them in the Executive Summary is a disservice because most of the public cannot spare the time to investigate those thousands of pages.

#### 1.5 Significant Impacts

I agree that these 10 bullet points will obviously be significant, however this list is incomplete and should be greatly expanded, even at the Executive Summary level, because this is the only section of the DEIR that the vast majority of the public can absorb.

## 1.6 Alternatives to the Proposed Project

This section does a commendable job of mentioning alternatives to the project. I have no further comments on it.

## 1.7 Impacts and Mitigation Summary Table

I note or recommend the following:

On Agricultural Impacts Section 4.2.6.1A, the donation by Highland Fairview for a 5-acre heritage farm is noted but some might see this as a cruel joke considering the overall loss of farmland under WLC warehouses and accessways. However, this idea has potential and the developer should work with gardeners or clubs to find the best soil or accessible site in the WLC for the amenity.

I strenuously object to the description of air quality Impact 4.3.6.1 and lack of feasible mitigation offered. I contest the statement "substantially improve the jobs/housing balance" and predict that if WLC is built out it will only marginally, at best, expand employment in Moreno Valley. The "jobs" argument in favor of this project is a Big Lie, as evidenced by past and current performance of Highland Fairview and Skechers.

Regarding Construction Phase Air Quality impacts 4.3.6.2 in general, the mitigation described is the usual boilerplate language for these kinds of large projects and I see little technological advancement over what's been done for decades. My concerns are with this huge, 41 million sq ft WLC project dragging on for years, with construction emissions becoming more "permanent" and having continual, nagging negative impacts on the entire eastern "Rancho Belago" section of Moreno Valley, and would suppress property values, positive attitudes and quality of life for a generation.

I object to the project's Air Quality 4.3.6 evaluation that will evidently lead to "significant and unavoidable" impacts as the WLC is built out. Lady and Gentlemen of the Council, severe truck-related local and long-term regional air pollutant emissions and chronic health risks are simply not worth it just to attain a marginal employment value and enrich the developer. This project's scope, impact and unfavorable location are simply incompatible with public health throughout the Inland Counties.

Impact 4.6.6.1 regarding mapped earthquake faults and Alquist-Priolo Fault Zone setbacks is adequately covered in the summary, however, I question the usefulness and reliability of work-around special engineering devices and schemes for building on or near the faults. The developer should refrain from building in these areas even though it would reduce the overall square-footage of the WLC.

I contest the statements in Impact 4.10. regarding WLC conflict with existing and applicable land use plans and policies where it promises the WLC "will substantially improve the City's jobs/housing balance" and therefore can avoid any stigma of

inconsistency with the General Plan upon its amendment to favor the project. Again, this huge 'jobs goldmine' is a greatly over-valued contention by the City, the developer and the Environmental Consultant. I predict only a marginal or inconsequential positive employment impact, especially with the price being paid by the community to accept this WLC boondoggle being forced on us.

Perhaps the WLC would not precisely "Physically Divide an Established Community", (see also in Impacts section 4.10,) but it will threaten and isolate the quality of life of the more rural and relaxed eastern side of Moreno Valley. Established neighborhoods such as the attractive Canterbury Downs and neighboring streets just west of Redlands Blvd, with large lots, horse stables, country clubs and even a few working farms will be negatively impacted forever by the poorly conceived World Logistics Center.

The quiet, established neighborhood of Old Moreno will be directly adjacent to WLC property and will suffer serious and needless impacts in many ways. The mitigation suggested in the EIR will be insufficient to maintain livability in Old Moreno and people will become disgusted with the overall environment and will have to fight a long battle to maintain their quality of life and property values. For example, see the story that's been in the press about the little neighborhood in Jurupa Valley at the NE corner of the 60 Freeway and Etiwanda Ave that is now ground zero for particulate pollution in the South Coast region, mostly due to transportation-generated emissions from trucks.

Long-term property values will likely suffer due to the intrusive presence of the WLC. This part of Moreno Valley should have been set aside for a rural gentry neighborhood similar to Riverside's Arlington Heights or parts of Redlands and Banning. It could be the pride of an upscale Moreno Valley instead of a Regional headache, eyesore and so-out-of-place industrial zone.

The section on traffic Impacts 4.15.7 seems, in my opinion to "hope and pray" the City can work with Caltrans and other agencies to "employ measures" to construct additional facilities needed for truck access to the WLC. The Executive Summary here retreats to the "significant and unavoidable" position yet fails to draw (or is concealing a point-by-point illustration of it) any nexus between truck traffic generated by 41 million square ft of warehouses and the subsequent need for widened freeways, interchanges and the expenses of truck-only climbing lanes through the Badlands to move WLC-based cargo to Eastern destinations. These upgrades will take a decade to complete and just don't appear by magic. In a state strapped for highway funds, there is no guarantee they could ever be built in time for 2035's full occupancy of the WLC and the resulting snafus would lead to night-and-day traffic nightmares throughout the Inland Region, as documented later in the EIR under Traffic and Circulation.

Table 1.B. List of All Mitigation Measures.

I'm glad the developer will have to preserve the olive trees along Redlands Blvd.

Glare from buildings will have negative impacts throughout the region and even stricter regulation of lighting glare will be needed to preserve “dark skies”. The proposed mitigation is a good step in the right direction but needs to be beefed up.

The many construction phase mitigation measures (4.3 & 4.4) are a valiant effort to clean up the messiest part of any project but most nearby residents and businesses are concerned that these measures will still fall short of adequately protecting existing neighborhoods. For example, dirt hauler trucks are chronic violators by the nature of their independent driver speed-up and by-the-load method of payment by vendors. This often leads to reckless, short cut driving behavior by some at times, as trucks descend on projects by the dozens, often in numbers beyond police power to control them. What can be done? The accumulative impacts of the construction traffic, hazards, fugitive dust and other annoyances will ruin the atmosphere in the east end of Moreno Valley for years, despite these efforts to mitigate them.

Besides, the current developer has a pattern of weaseling out of conditions of approval and other regulations during the actual discretionary review process – as exhibited when Skechers went thru Planning - and in my opinion this behavior will not change and some of the mitigation measures will end up existing only on paper. The developer’s friends on the City Council will likely coddle and protect their benefactor.

In Measure 4.5.6.2B, I’m glad the developer will contribute to a Juan Bautista de Anza historic marker.

Under Noise Mitigation measures, Section 4.12.6 regarding sound walls, many of the proposed sound walls are quite distant from the World Logistics Center, indeed one is contemplated for somewhere along Riverside’s Sycamore Canyon Blvd. near Central Ave, (unclear in Mitigation Measure text as to its precise location) nearly 10 miles distant from the WLC, along the steep “Box Springs Grade” of Interstate 215 and State Route 60. This is apparently to reduce traffic noise from vastly increased truck movement resulting from the project. The Final EIR needs to better explain the rationale behind requiring a sound wall so distant from the project site. Some explanation is given in The Traffic and Circulation portion of the EIR, later on.

Despite the noise studies, I doubt the effectiveness of all these distantly placed sound walls. Indeed, I find that this particular Sycamore Canyon one illustrates the impacts of additional truck traffic noise that could affect all existing residential and commercial neighborhoods all across Moreno Valley adjacent to the 60 Freeway. It will become a “river of noise” impacting the lifestyle of the heart of the City. This underscores the little-publicized nuisance and intrusion of truck traffic noise brings into existing homes.

As an additional mitigation measure, the speed limit for all big rig trucks along the 60 Freeway, for 10 miles either side of the WLC, should be reduced to 45 mph for safety and noise-reduction reasons. The EIR’s noise consultant should perform the calculations showing how noise levels would be mitigated.

Regarding Traffic and Circulation Mitigation Measures, in Section 4.15.7, I oppose the unfair degree of reduced TUMF and DIF fees to be assessed on individual warehouse development projects. The City Council brokered this cozy arrangement by consultation with and undue political pressure upon WRCOG to benefit the developer to use this fee reduction as a marketing selling point. I have seen these reductions used in real estate ads for competing logistics complexes in Adelanto and Victorville, for example. Although some minor relief from DIF and other fees for warehouses is common, nationally, in my opinion, this “gift” to the WLC developer is excessive and unfair to others who have participated in these fee assessments.

Any TUMF fee reduction for high cube warehouses would be especially unwise considering that these heavily overweight trucks serving the project would disproportionately assail and damage the public roads in comparison with other traffic that pays more than their share of the highway repair bills. Trucks are always beating up the pavement and crashing into overpasses. Our little automobiles don’t do either. This is another example of a cushy deal that benefits only the developer, warehouses and trucking companies while the general public pays an unfair share for infrastructure.

I don’t have a lot of confidence in any agency, especially the City of Moreno Valley to successfully identify and implement adequate funding sources for State and “extra-territorial improvements” (alas, unwelcome transportation jargon for “widening the 60 Freeway between Riverside and Beaumont”) as written in 4.15.7.4F. The cost of such a project alone would approach \$1 billion in scarce highway widening funds. Such a costly concept for widening 60 would have to compete, politically, with hundreds of other worthy projects on the drawing boards, statewide. I feel the same way regarding all the interchange improvements needed.

### **C: Comments on Section 2.0, Introduction and Purpose.**

I agree that the Program EIR is the appropriate CEQA process for the World Logistics Center however that processing benefit to the developer needs to be balanced with greater public input and discourse than has been allowed and encouraged by the City Leadership, so far. A project of this vast local and regional significance deserves every opportunity to go beyond the minimum that the law requires and not be, to any degree, ‘railroaded’ through the approval process. In my opinion, the City has not been fair about this and in fact has given undue voice and even tax dollars to support to promote and favor the developer, primarily and not a fair and comprehensive public discussion.

The 45 issues identified in Table 2.B seems to be an adequate basis for discussion.

### **D: Comments on Section 3.0 Project Description:**

I reject, resist and will not personally adhere to using the “Rancho Belago” mis-designation of eastern Moreno Valley. This appellation is an artificially created

marketing device of dubious value and has not been supported by polling data or anecdotal comments from the citizens of Moreno Valley, including former City leaders. Although a few current City Council members have to various degrees supported the label, it evidently has little public support. This designation has never been put to a citywide referendum because there is doubt it would be approved.

I generally support the intent and land use designations as depicted in the existing but not implemented Moreno Valley Highlands Specific Plan. To me they are imminently preferable over the World Logistics Center. Although development as envisioned by that plan has not occurred, an improving economy seems to have increased interest in residential uses, especially "rural estate" or similar type larger homes which could be available at bargain rates in Moreno Valley, with some proper marketing initiatives.

Sections 3.4.2 and 3.4.6.1 fail to adequately describe the distinctions between "high cube" and conventional truck dimensions. The revised EIR needs to explain the etymology of the appellation "high cube", especially as it applies to global logistics standards and patterns of efficient goods movement both in the field and in warehousing facilities. Why is it called "high", compared to what, people are asking.

Further, this expanded High Cube descriptive section needs considerable expansion and enhancement to compare dimensions, especially the height, the cargo weights both empty and full and the braking distances at various speeds between the High Cube tractor- trailers and smaller conventional trucks that still dominate the trucking business. The California Highway Patrol probably has some methodology to make the calculations. Current literature in trade magazines and other sources (such as WRCOG's studies) provide plenty of data and interpretation of the role of High Cube trucks and its safety, congestion and cargo-carrying consequences.

My point is that by leaving out this necessary safety data, the project proponents are again concealing vital information that could reveal further negative impacts that the public and first responders need to know the WLC will cause. I can't help but feel this descriptive data was a deliberate omission.

The Section 3.4.8, Architectural Guidelines, needs a list of some local examples of 60 and 80 ft warehouse building heights (approximately, of course) that can be viewed by interested parties onsite and in person so that their true visual impacts could be gauged. 80 feet (8 stories?) will be judged by many to be too tall. The Skechers building would be a prime example to list, as would the soon-to-be-vacated Fresh & Easy Warehouse off the 215 Freeway near Van Buren Blvd and also other warehouses in the southwest section of Moreno Valley.

Its noted in the Phasing Section 2.4.13 that full WLC build out of both phases is tentatively projected for 2022 while elsewhere in the document I believe it states 2035. Please clarify.

## **Comments on Section 4.0 Environmental Impact Evaluation:**

In the Aesthetics Section, 4.1, the developer has made a valiant effort as depicted in the many artist's renderings to shield and screen warehouses and truck parking areas from nearby residential properties by means of landscaping and robust earthen berms. Viewsheds from various developer-selected locations on the project perimeter are detailed and well evaluated but they still lack a vital component of the overall Aesthetics impacts of the WLC, as follows:

This section barely and inadequately addresses the very important issue of Community Gateway views, the aesthetic impressions that impact westbound motorists who may be seeing our city of Moreno Valley for the first time when they emerge from The Badlands. I'm afraid that a 41 million square feet sea of warehouse walls and rooftops will have leave an immediate and lasting negative impression on visitors and long-time residents alike. The EIR should include a section addressing the Community Gateway issue.

Most cities leaders and community groups such as Chambers of Commerce are very sensitive to how visitors view their community as seen from its entrances. Despite the dubious promises of improved employment, is a negative community visual image worth the costs of the project? I could cite several examples of where Moreno Valley has tried to improve its gateways (such as at Alessandro and Old 215) and where Corona, Temecula, Riverside and others have made vast scenic and often acclaimed gateway modifications and improvements. In my opinion, having a rather ugly and obtrusive World Logistics Center as our "Welcome to Moreno Valley" entry statement will put us near the bottom of the list, aesthetically, among Inland area cities. Such a view may be heavenly to a developer but not to the traveling public. I think we could do better. And our warehouses belong in the southwestern part of the city, not at a primary gateway.

Section 4.3, Air Quality, there appears to be no mention that the northeast portion of Moreno Valley constitutes a minor geographic basin, lobe or "pocket" as it is partially surrounded by hills that tend to capture air pollution as spread by prevailing west winds, 90% of the time. This is the area where much of the WLC would be sited and where the vast majority of incoming and outgoing truck traffic would be travelling and emitting pollutants. Such pockets will collect and concentrate a substantially higher level of pollutants and allow them to persist for longer periods than flatter lands.

Were any air quality monitoring devices placed at the intersection of the 60 Freeway and Theodore, for example, over 9 months or so, providing a representative sampling of existing air quality at the WLC project site? If not, accuracy of air quality readings and predictions falls off rapidly with the distance from the WLC, despite modeling protocols. The nearest monitoring station is near Downtown Riverside, 15 miles west of the project site.

I note that Figure 4.3.8, a map of "Change in Air Toxics, 1998 to 2005" in the South Coast Air Basin indicates that the worst increases, more than 250% over those 7 years, is air pollution occurring near the Ports of Los Angeles and Long Beach. The WLC is envisioned by its promoters as a dependent sub-concentration of cargo traffic closely dependent those ports and therefore its connecting routes would tend to drag this area of increasing pollution in the direction of Moreno Valley.

Still in the Air Quality section, it is also curious why the EIR mentioned Dr Enstrom's discredited, truck-industry financed study that declared the subset of career truck drivers as actually having healthier lungs than the general population. The study seeks to minimize the health effects of diesel particulates. Sounds like those "smoking is good for you" declarations by the tobacco industry in the 1950s! It almost makes us want to move next door to the World Logistics Center to improve our overall health.

Its noted that the developer and environmental consultant interpreted air quality modeling and Air District regulations to arrive at a trip rate for the WLC of 1.68 trips per thousand square feet of warehouse space, described as a conservative basis for consequent complicated air quality calculations applicable to the WLC at full build out.

Nevertheless, several statements in the Air Quality analysis reveal that the overall project in both construction and operational phases will exceed most air quality standards and impede overall regional clean air attainment plans, thus leading to reversed progress in improved air quality both locally and regionally. This situation is unacceptable to the people of Moreno Valley and the Inland Counties. This is a primary reason why we oppose the World Logistics Center project.

Yikes! Compelling Figure 4.3.10 and other illustrations show the modeled Cancer Risks as particularly hazardous along the 60 Freeway corridor and especially around the WLC site. Compared with the No Project alternative or the Moreno Valley Highlands Specific Plan, these figures demonstrate the likelihood of a great increase in air toxics, bringing Eastern Moreno Valley into the same category as the current (2012) ground zero of pollution near the Ontario Airport. It also appears that, even with mitigation, the Old Moreno neighborhood will suffer more than double the amount of life-threatening pollution as compared to the WLC not being built.

The Soils and Geology Section, 4.6, I note that the EIR seems to adequately deal with the potential effect of earth-movement faults within or near the project site. State regulations will be observed and all building codes related to tilt-up concrete construction will be enforced as development occurs. There will be further geologic investigation as necessary for particular building parcels adjacent to the active San Jacinto Fault.

I might point out that my own calculations regarding a serious earthquake impacting Moreno Valley suggest the San Jacinto fault has a greater than 50% chance of creating a 7.0 earthquake over the next 30 years. Subsequently, I have purchased full quake

coverage for my home in Moreno Valley, located about 4 miles from the fault. Most geologists agree that in general, this area is “long overdue” for a serious seismic event. This insurance would pay for full replacement value in case my home is red-tagged and could not be occupied due to damage that a 7.0 shaker might produce. Will the buildings and occupants of the WLC be ready in case of such an earthquake?

In Section 4.10, regarding transit service, it is fair or correct for the developer to refer to Riverside Transit Agency’s Route 35 as having a potential to directly serve the World Logistics Center? It would take more than mere rerouting. Route 35 has a limited schedule, makes very few stops and currently uses smaller rolling stock than the standard 40-passenger bus. The developer or other agency should recognize that the WLC would be a significant generator of new bus demand, even if the rosy employment projections are scaled back. I recommend the City stay in touch with RTA planners.

The developer or the City should eventually approach RTA to determine if a new or revised route could more effectively serve a built out WLC. Since warehouse staffing tends to be two or even three shifts, employing mostly part-time, labor-contractor personnel, a more robust RTA service will eventually be necessary. Low-paid workers tend to use transit more, recent studies indicate.

In the Noise Section, 4.12, under Long-Term Traffic Noise Impacts, it states that there would be about 50 more peak hour trips added due to the project, evidently including both truck and employee traffic. With truck traffic, and the nature of the business of shipping, this amount of trips would likely continue for most of the 24-hr day, making truck noise near the project and indeed all along the 60 Freeway corridor a serious nuisance that most nearby residences will find objectionable.

Some of the noise modeling charts for the built out project also suggest negligible increases in noise due to the project but I personally find that hard to accept and would be more worried about the constant and continuing din of additional truck traffic on the 60 Freeway. However, later on, text explanations describe significant future noise impacts near the project.

One isolated location in the text, Placentia Ave near Evans Rd is actually way, way south of the site in the middle of the City of Perris and is sheltered by Lake Perris’ mountains from the WLC. I wonder how this paragraph got into the study? A proofreading error, perhaps, when some other project’s text was copied and pasted into the WLC noise materials? This location is quite far from the project. Indeed, there are several other locations in the text, such as Day St between Cottonwood and Alessandro that seem out of place in the text and I believe instinctively that they would not suffer a “significant and unavoidable” impact. I’m no noise modeling expert but some parts of this study seem very out of place or not well thought out as applicable to the WLC.

Further, I didn't spot a handy area map in the Noise Section depicting the location of all these noise monitoring stations so that they could be studied logically. Therefore a map is needed, and probably a reality-check review of the Noise Section.

Table 4.13.F for Employment estimates is in my opinion, overly optimistic about the number of eventual jobs generated by the WLC project. The Skechers operation, for example, has not proved to be the employment dynamo its promoters promised the community. A person familiar with the Skechers operation told me just last week that only 160 people work there compared to the 2,000 that was originally predicted by the developer. Even the City scaled down the estimates over the months of construction from 2,000 down to 500 and even that amount has not come forth. The track record of jobs prediction for WLC-related warehouses has not turned out as promised. It's a wholesale misleading of the public to continue throwing out these job numbers to misguide the public into approving the project.

I also contend that the projected annual wages for warehouse workers at the WLC are highly inflated and need to be revised to reflect real conditions. An independent survey (not overseen by employers) is needed to determine the actual take home pay occurring at Skechers. Besides, global logistics patterns will be changing in years ahead, reducing business interest in the WLC and its ill-conceived location, further lowering employment and salary expectations.

My review of the Traffic and Circulation Section 4.15 indicates a total of about 71,000 trips per day as a result of the built out World Logistics Center. Unfortunately I was not able to fully review this section. Parsons & Brinckerhoff have done their usual thorough job on the traffic analysis, a very complicated part of the EIR. Although I don't have anything further to add until I study the materials further, I note several key points such as 80% of the vehicle trips to warehouses are via employee vehicles, not trucks.

However, I instinctively fear that the built-out project will have a tremendous and negative traffic impact on the City of Moreno Valley that is difficult even for the experts to predict through the modeling. All aspects of heavy and continual truck traffic will bring more noise, pollution, loss of levels of service, road damage, congestion and accidents to our community and on these grounds alone, the WLC is demonstrated to be a detriment to the City despite the dubious job growth predictions. The traffic analysis seems to back up many of opponents' fears as the EIR's claims of significant impacts being unavoidable and that impacts will remain despite mitigation measures.

In the Traffic mitigation measures portion of 4.15, the extensive list of road projects alone needed to improve capacity, signalization, and other circulation infrastructure improvements will place a staggering financial burden on the general public, despite any contributions by the developer or eventual occupants. I'm astounded at the millions of dollars these projects will take from tax revenues and other sources. This money could be better spent on other needs, first. The existing Moreno Valley

Highlands Specific Plan, if instead implemented over time, would reduce the need for the WLC's level of improvements and save millions of tax dollars.

The negative effects on the already-stressed Freeway 60 "Mainline" are extremely challenging to existing and future traffic patterns and community comfort levels as described in the Traffic Study. In fact, impacts to the uphill portion of 215-60 near the Central Ave. interchange, for example, are so bad as to be unavoidable and without any means of significant mitigation. There's no room left to widen the freeway, the study states without threatening existing homes and businesses. This assessment of "unavoidable impacts to the Mainline" is repeated dozens of times throughout the freeway system in the Inland Counties, according to the EIR text. The WLC-based additional traffic, 71,000 trips more per day, will basically ruin and totally gum up what little mobility we have now on those routes. The 60 is maxed out, ladies and gentlemen!

Ironically, such congestion would also negatively impede WLC-bound truck traffic, making the WLC less accessible, becoming a stuck-in-gridlock waste of travel time, and less attractive as a warehouse staging and storage area, as seen in competition with other warehouse centers such as in Victorville and Palmdale along more freely-flowing Interstate routes.

Further, the study mentions that Caltrans plans to add a truck lane through The Badlands but I have my doubts as to when, if ever, this improvement becomes operational.

Finally, in Section 5.0, Other CEQA Topics, a huge list of unavoidable environmental bad stuff welcomes us to this part of the discussion. How discouraging to read this list and wonder how it would negatively erode the quality of life in Moreno Valley, despite the promise of 24,000 jobs.

This concludes my comments on the Draft EIR for the World Logistics Center. Good luck ladies and gentlemen in incorporating the EIR into the complicated debate on whether or not to approve this project.

Thank you.

Michael McCoy  
10304 Crossing Green Cir  
Moreno Valley, Ca 92557

[mikeandnan@mac.com](mailto:mikeandnan@mac.com)