

Chris Ormsby

From: Sunshine Lopez <sunshineelopez@gmail.com>
Sent: Tuesday, May 18, 2021 12:16 AM
To: Chris Ormsby
Subject: PLEASE EXTEND PUBLIC COMMENT WINDOW

Warning: External Email – Watch for Email Red Flags!

Hello,

I'm a concerned Moreno Valley resident and I'm emailing you in hopes that you and the General Committee will extend the window for comments on crucial documents from 45 days to 60 days, it is vital that the committee stays engaged with the community, especially when making decisions that could impact Moval residents for decades. Please give an adequate update as to when we can make comments on documents, and be willing to extend the timeframe we need to do so.

Thank you,
S. Lopez

Chris Ormsby

From: Andrea Delgado <adelg004@gmail.com>
Sent: Tuesday, May 18, 2021 12:22 PM
To: Chris Ormsby
Subject: Request for Extension on Public Comment for CAP, EIR, GP

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Good afternoon,

My name is Andrea Delgado, and I am a community member of Moreno Valley. I am emailing you to urge you and the General Plan Committee to extend public comment on these important documents from the 45-days to the 60 days, in order to engage more of the city's community on such crucial matters.

There is not enough engagement or enough time for the community to read and comment on the three crucial pieces of policy and documentation regarding the future of the city. The overall process has been moving fairly quick and has lacked consistent engagement. Given the fact that we remain in a health crisis, and the update has been entirely through COVID-19, it means local engagement has been difficult and therefore, does not represent the entirety of the Moreno Valley community.

Therefore, I urge you and the committee to extend the deadline for public comment to 60 days and increase engagement in the next month to get the community to comment on the draft Climate Action Plan, draft Environmental Impact Report, and draft General Plan.

Thank you for being mindful of our community.

Chris Ormsby

From: Janet Bernabe <janet.b@ccaej.org>
Sent: Tuesday, May 18, 2021 12:23 PM
To: Chris Ormsby
Subject: General Plan Committee: Extending Public Comment Deadline

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Good afternoon, my name is Janet Bernabe Organizing Director for the Center for Community Action and Environmental Justice CCAEJ and a resident of Riverside County. I am emailing you to urge you to extend the public comment period from the 45 days to 60 days as it is crucial to include community comments to the General Plan. There was not enough outreach and/or time for community members to read through three (3) important documents. Therefore, I urge you and the committee to extend the deadline for public comment to 60 days instead of 45 days which will give community members additional time to make a public comment.

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Thank you,

Janet Bernabe
Organizing Director
Center for Community Action and Environmental Justice
Centro de Acción Comunitaria y Justicia Ambiental
P: (951) 543-1752 | C: (951) 581-0781
E: janet.b@ccaej.org | W: www.ccaej.org
Address: PO Box 33124 Riverside, CA 92519



"We cannot seek achievement for ourselves and forget about progress and prosperity for our community... Our ambitions must be broad enough to include the aspirations and needs of others, for their sakes and for our own." - Cesar Chavez

Chris Ormsby

From: Norma Mungia <ngmunguia@aol.com>
Sent: Tuesday, May 18, 2021 2:52 PM
To: Chris Ormsby
Subject: General Plan

Warning: External Email – Watch for Email Red Flags!

Dear Mr. Ormsby, council staff and planning commission,

I am writing to voice my opposition to the proposed general plan update and draft EIR and ask that this document be entered into the public record (and actually read by staff, planning commission and staff). CEQA identified two alternatives that protect the NE end of Moreno Valley, **6.4 Reduced Growth Alternative and 6.5 Redistributed Growth Alternative which has been identified as 6.6 Environmentally Superior Alternative**. Both of these alternatives retain our 2006 general plan land uses in the NE and are the appropriate actions.

The city has repeatedly been unwilling/unable to protect residents from significant negative impacts related to but not limited to noise, truck traffic, pollution, and crime created by unethical and improper rezoning. We can't trust the city to protect the NE area therefore we respectfully request that the CEQA alternatives be adapted. Our health and quality of life need to override developers profit.

Norma Munguía
28116 White Sand Trail
Moreno Valley, Ca 92555
(951)992-8478

Chris Ormsby

From: sjlstar <sjlstar@aol.com>
Sent: Tuesday, May 18, 2021 5:52 PM
To: Chris Ormsby
Subject: GENERAL PLAN

Warning: External Email – Watch for Email Red Flags!

Dear Mr. Ormsby, council staff and planning commission,

I am writing to voice my opposition to the proposed general plan update and draft EIR and ask that this document be entered into the public record (and actually read by staff, planning commission and staff). CEQA identified two alternatives that protect the NE end of Moreno Valley, **6.4 Reduced Growth Alternative and 6.5 Redistributed Growth Alternative which has been identified as 6.6 Environmentally Superior Alternative**. Both of these alternatives retain our 2006 general plan land uses in the NE and are the appropriate actions.

The city has repeatedly been unwilling/unable to protect residents from significant negative impacts related to but not limited to noise, truck traffic, pollution, and crime created by unethical and improper rezoning. We can't trust the city to protect the NE area therefore we respectfully request that the CEQA alternatives be adapted. Our health and quality of life need to override developers profit.

Stella Locke
28195 Hemlock Ave.

Chris Ormsby

From: Watson, Scott <SWatson@riversideca.gov>
Sent: Wednesday, May 19, 2021 11:11 AM
To: Chris Ormsby
Subject: RE: [External] RE: MoVal 2040 GP Update
Attachments: Moreno Valley General Plan - PRCSD.pdf

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Hi Chris,

In my haste to send you the letter this morning I failed to include the attached Memo from the Parks Department. Please include it as part of our Public Comment letter.

Scott K. Watson
City of Riverside
Community & Economic Development, Historic Preservation
Main: 951.826.5371
Direct: 951.826.5507
RiversideCA.gov

From: Chris Ormsby <chriso@moval.org>
Sent: Wednesday, May 19, 2021 9:33 AM
To: Watson, Scott <SWatson@riversideca.gov>
Subject: [External] RE: MoVal 2040 GP Update

Scott,

Thanks for the comments. Although the comment period on the Draft EIR itself closed on Monday, comments on the General Plan itself can be made up until, and at the public hearing until public testimony closes, so the City will consider the letter as public comments in this regard.

With regard to the CEMU and BF zones, the zoning for the CEMU is not intended to make any changes to the Towngate area except that mixed use/multi-family residential would be allowed on the mall site. The BF zone is primarily a change from commercial zoning and a small area of multi-family zoning to Business Flex which allows for a more limited range of commercial uses and some business park uses that are more consistent with the ALUC Plan than the existing zoning.

If you wish to review the full Planning Commission packet, it would be available on the City's website no later than Monday, May 24.

Chris

Chris Ormsby
Senior Planner
Community Development
City of Moreno Valley
p: 951.413.3229 | e: chriso@moval.org w: www.moval.org
14177 Frederick St., Moreno Valley, CA 92553

TOP RANKED
FISCALLY STRONG CITY
IN THE NATION

*As ranked by The Fiscal Times®



From: Watson, Scott <SWatson@riversideca.gov>

Sent: Wednesday, May 19, 2021 9:19 AM

To: Chris Ormsby <chriso@moval.org>

Subject: MoVal 2040 GP Update

Warning: External Email – Watch for Email Red Flags!

Good Morning Chris,

My profound apologies, the last two days have gotten away from me. I meant to send the attached comment letter from the City of Riverside on Monday but had a staff member call out sick and I had to cover for her. Would you be willing to accept a late submission of the City of Riverside's comments?

Scott K. Watson
City of Riverside
Community & Economic Development, Historic Preservation
Main: 951.826.5371
Direct: 951.826.5507
RiversideCA.gov

Keep Riverside healthy: Wear a face covering, maintain healthy diet and exercise, wash your hands, and get vaccinated. RiversideCA.gov/COVID-19



Community Development
Department
Planning Division

City of Arts & Innovation

May 17, 2021

Chris Ormsby, Senior Planner
Community Development Department
City of Moreno Valley
14177 Frederick St.
Moreno Valley, CA 92553

Subject: City of Riverside's Review of a Notice of Availability of a Draft Program Environmental Impact Report for the Moreno Valley Comprehensive General Plan Update

Dear Mr. Ormsby:

Thank you for the opportunity to comment on the City of Moreno Valley's Notice of Availability of a Draft Program Environmental Impact Report (DEIR) for the Moreno Valley Comprehensive General Plan Update (MoVal 2040). The City understands that the MoVal 2040 also includes the 2021-2029 Housing Element Update and a Climate Action Plan (CAP).

The City has reviewed the DEIR, MoVal 2040, and CAP, and provides the following comments:

Community and Economic Development Department – Planning Division:

- The City of Riverside request analysis of potential impacts to areas within the City of Riverside adjacent to proposed Center Mixed Use and Business Flex General Plan Areas. This includes impacts to the Canyon Springs area of Riverside adjacent to the proposed Center Mixed Use at the Moreno Valley Mall and the TownGate Center.

Public Works Department – Traffic Engineering Division:

- The Public Works Traffic Engineering Division notes that the City of Moreno Valley is preparing an update to its ATP. For your reference, the draft Riverside ATP can be viewed at: www.riversideca.gov/pact

Parks, Recreation and Community Services Department:

- On "Map OSRC-1 Regional Open Space and Trails," show only the official trails adopted in the Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan. Please refer to attached memo from the Parks, Recreation, and Community Services Department for more information.

The City of Riverside appreciates your consideration of the comments provided in this letter. Should you have any questions regarding this letter, please contact Scott Watson, Historic Preservation Officer, at (951) 826-5507, or by e-mail at swatson@riversideca.gov.

We thank you again for the opportunity to provide comments on this proposal and look forward to working with you in the future.

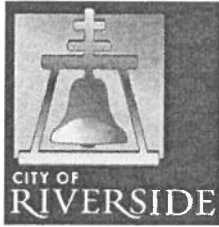
Sincerely,

A handwritten signature in black ink, appearing to read 'DMurray', written over a horizontal line.

for

David Murray
Principal Planner

cc: Patricia Lock Dawson Mayor
Riverside City Council Members
Al Zelinka, FAICP, CMSM, City Manager
Rafael Guzman, Assistant City Manager
David Welch, Community & Economic Development, Director
Mary Kopaskie-Brown, City Planner
Kris Martinez, Public Works Director
Kristi Smith, Chief Assistant City Attorney



MEMO

Parks, Recreation and Community Services Department

DATE: 05/11/2021

TO: SCOTT WATSON, COMMUNITY AND ECONOMIC DEVELOPMENT
DEPARTMENT

FROM: ALISA SRAMALA, PARKS, RECREATION AND COMMUNITY SERVICES

CC: RANDY MCDANIEL, PARKS, RECREATION AND COMMUNITY SERVICES

RE: **Moreno Valley Comprehensive General Plan Update**

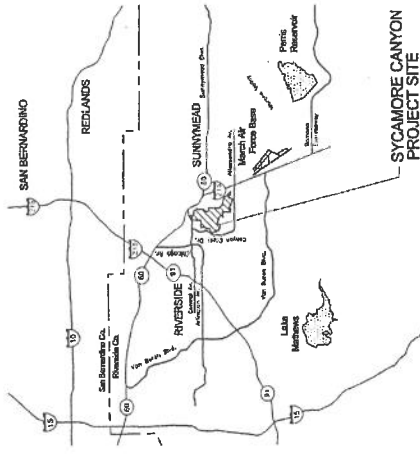
Thank you for the opportunity to review the Moreno Valley Comprehensive General Plan Update. Our office is the department of Parks, Recreation and Community Services Department, Planning and Design Division. One of our areas of responsibility is the development, implementation and management of parks and trails per the City of Riverside's Parks Master Plan and the Trails Master Plan.

We have the following comment on the Moreno Valley Comprehensive General Plan Update. On "Map OSRC-1 Regional Open Space and Trails," show only the official trails adopted in the Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan. The map is attached for reference. GIS data can be provided. Please contact Alisa Sramala at asramala@riversideca.gov to request the data.

SYCAMORE CANYON WILDERNESS PARK Conceptual Development Plan Revision

LEGEND

- ① Proposed Kangaroo Ct. - Interpretive Center
- ② Sycamore Canyon Blvd. - Trailhead
- ③ Barton St. - Trailhead
- ④ Canyon Crest Dr. - Trailhead
- ⑤ Central Ave. - Trailhead



KEY PLAN
N.T.S.

Existing Trails, Trail Heads & Emergency Access

Figure 4-8



SCALE IN FEET

CONTOUR INTERVAL: 10 FEET



Chris Ormsby

From: Ashley Beltran Munoz <ashleybeltranm@gmail.com>
Sent: Thursday, May 20, 2021 8:13 AM
To: Chris Ormsby
Subject: Extend Public Comment for Climate Action Plan, draft Environmental Impact Report, and draft General Plan

Warning: External Email – Watch for Email Red Flags!

My name is Ashley Beltran Munoz, and I am a community member of Moreno Valley, and I am emailing you to urge you and the General Plan Committee to extend public comment from 45-days to 60-days on these crucial important documents. The community engagement piece for public comment was poorly handled as I was not even sent a notice nor did I find out public comment was due until today. There was not enough engagement or enough time for the community to read through and comment on three crucial pieces of policy and documentation for the future of the city. The overall process has been moving extremely quickly and has lacked consistent engagement. Given that and the fact that we are still in COVID-19 and the whole update has been through COVID-19, it means engagement has been difficult for the community and does not represent the entirety of the Moreno Valley community. Therefore, I urge you and the committee to extend the deadline for public comment for 60 days and increase engagement in the next month to get the community to comment on the draft Climate Action Plan, draft Environmental Impact Report, and draft General Plan. Thank you.

Chris Ormsby

From: Padilla, Lacy (TRBL) <lpadilla@aguacaliente.net>
Sent: Friday, May 21, 2021 11:32 AM
To: Chris Ormsby
Subject: MoVal 2040
Attachments: 03-024-2021-005ACBCI5_21_2021.pdf

Warning: External Email – Watch for Email Red Flags!

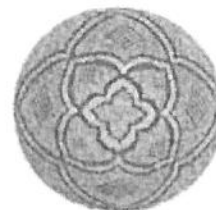
If you have any questions about the attached letter please feel free to contact me.

Thank you,

Lacy Padilla
Archaeologist
Agua Caliente Band of Cahuilla Indians
5401 Dinah Shore Drive Palm Springs, CA 92264
D: 760-699-6956 | C: 760-333-5222

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION



03-024-2021-005

May 21, 2021

[VIA EMAIL TO:chriso@moval.org,]
City of Moreno Valley
Mr. Chris Ormsby
14177 Frederick Street, P.O. Box 88005
City of Moreno Valley, CA 92552-0805

Re: MoVal 2040

Dear Mr. Chris Ormsby,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the MoVal 2040 project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. For this reason, the ACBCI THPO requests the following:

*Formal government to government consultation under California Assembly Bill No. 52 (AB-52).

*Copies of any cultural resource documentation (report and site records) generated in connection with this project.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760)699-6956. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Lacy Padilla
Archaeologist
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

Chris Ormsby

From: George Hague <gbhague@gmail.com>
Sent: Sunday, May 23, 2021 10:22 PM
To: Chris Ormsby
Subject: SCAQMD Letter on Moreno Valley's General Plan Update and CAP
Attachments: Screen Shot 2020-05-28 at 4.21.37 PM.png; Untitled attachment 00040.htm; MoVal 2040 GPU DEIR - Sierra Club Comments- 5-17-21.pdf; Untitled attachment 00043.htm; SCAQMD Letter 5-14-2021.pdf; Untitled attachment 00046.htm

<http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2021/may/RVC210406-01.pdf>
SCAQMD letter to the City of Moreno Valley on its GPU/DEIR/CAP

Good morning Planning Commissioner,
23, 2021

Sunday May

As I have mentioned before, reading letters from attorneys and agencies helps me better understand the documents about which they write. The South Coast Air Quality Management District's (SCAQMD) two page letter is in the link found above. They then provide several pages of attachments to help the city learn what they need to do to improve in the areas of concern. Attached at the bottom is the letter submitted by the local Sierra Club Group/Chapter by an attorney they hired to help our city have the best possible General Plan Update (GPU) and Climate Action Plan (CAP) for the residents and environment.

Both letters focus mainly on the Air Quality with a need for much better Analysis and Enforceable Mitigations. Both need to be incorporated before any recommendation/approval and your agenda packet for your Thursday's meeting shows they haven't.

As part of CA Senate Bill 535 (<https://oehha.ca.gov/calenviroscreen/sb535>) much of Moreno Valley is designated a Disadvantaged Community as can be seen in red on the map found/attached below. Much of our city has this designation in large part because of problems with our Air Quality and Greenhouse Gas pollution based on current and yet-to-be built approved projects. Our GPU and CAP as currently written fails to significantly reduce these pollutions and their health impacts on our residents — both short term and throughout the life of the GPU.

Stay safe,

George Hague

**Law Office of Abigail Smith
A Professional Corporation**

2305 Historic Decatur Road, Suite 100, San Diego, CA 92106

Abigail A. Smith, Esq.
Email: abby@socalceqa.com
Telephone: (951) 808-8595
Facsimile: (951) 972-8488

VIA E-MAIL ONLY

May 17, 2021

Chris Ormsby, AICP, Senior Planner
Community Development Department
City of Moreno Valley
14177 Frederick Street
Moreno Valley, CA 92553
chriso@moval.org

Re: Public Comments—MoVal 2040 Draft Environmental Impact Report

Dear Mr. Ormsby:

Please accept these comments on behalf of the Sierra Club regarding the City of Moreno Valley's MoVal 2040 Project including the Draft Environmental Impact Report ("DEIR") and Climate Action Plan ("CAP"). The MoVal 2040 Project ("Project") constitutes a comprehensive update to the City's existing 2006 General Plan. The General Plan Update ("GPU") replaces the 2006 General Plan, adopts new policies, and creates new land use designations for certain areas of the City.

The purpose of this letter is to inform the City that the DEIR is legally inadequate in that the DEIR fails to comply with the requirements of the California Environmental Quality Act ("CEQA"). The DEIR must be revised and recirculated as detailed below. We also urge the City to delay any public hearings on the GPU Project until the City has fully considered public comments on the DEIR and until a Final EIR can be circulated for public review and comment.

Among other things, the DEIR and CAP must be revised with respect to mitigation of greenhouse gas emissions. Because future implementing projects will rely on the Project's EIR and CAP for "streamlining" purposes, it is essential that they contain mandatory, enforceable measures aimed at achieving actual reductions in greenhouse gas emissions. As proposed, the DEIR and CAP contain "policy" measures that are "aspirational" rather than compulsory. And, as the GPU will govern the City's development through year 2040, it is essential that verifiable reductions in GHG emissions occur, consistent with State laws, regulations, and Executive Orders aimed at reducing GHG emissions in that timeframe.

Additionally, the DEIR must be revised to reflect a finding of “significance” in both the areas of air quality and energy impacts, and appropriate mitigation must be adopted. The DEIR proposes not a single air quality or energy mitigation measure based on the specious conclusions that impacts are less than significant.

A. The DEIR’s Environmental Baseline Is Not Supported by Substantial Evidence

CEQA requires “a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation [NOP] is published...” State CEQA Guidelines, § 15125(a). Here, the GPU DEIR repeatedly states that the Project’s environmental impacts are less than significant “compared to buildout of the existing 2006 General Plan.” *See, e.g.*, DEIR p. 4.16-29. This environmental baseline is flawed in that it fails to account for the vast number of industrial warehouse projects approved in the City in the last 10-15 years, including the City’s approval in August 2015 of the 40 million square foot World Logistics Center (“WLC”) project, which will be one of the largest industrial warehouse complexes in the United States. The City must accurately disclose the baseline for analysis of impacts, accounting for actual growth in the City since the adoption of the 2006 General Plan.

At the very least, the DEIR must be revised to disclose the data and information comprising the “baseline” for analysis of impacts. For instance, we could not locate a list of “cumulative projects” in the DEIR, or any list of reasonably foreseeable future projects pending approval; and, while in some places, the DEIR asserts it is relying on a “2018” baseline, we still could not locate a list of projects or data that would inform the reader as to what assumptions are included in that “2018 baseline.”

Accordingly, the DEIR does not provide substantial evidence to support its environmental baseline.

B. The Programmatic EIR Must Contain Detailed Analysis of Impacts and Enforceable Mitigation for Significant Impacts

Again the DEIR lacks information about the assumptions and data used to make conclusions about the GPU’s environmental impacts. The DEIR repeatedly disclaims the need for analysis of the impacts associated with buildout of the subject Planning Area, as it asserts it is a programmatic document and that more detailed environmental review may be performed for future implementing projects. This is inadequate. CEQA requires that a program EIR provide analysis of impacts “as specifically and comprehensively as possible.” Guidelines, § 15168 (a)(c)(5). Among other things the program EIR must consider “cumulative impacts that might be slighted in a case-by-case analysis.” Guidelines, § 15168(b)(1)-(2). Importantly, “[d]esignating an EIR as a program EIR also does not by itself decrease the level of analysis otherwise required in the EIR.” *Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency* (2000) 82 Cal.App.4th 511, 533. A program-level EIR must contain “extensive, detailed evaluations” of

a plan's effects on the existing environment. *Environ. Planning & Info. Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 358. Consequently, the DEIR must be revised to include more information about the impacts associated with the buildout of the Planning Area, and it must include information about the assumptions used to reach its conclusions – *i.e.*, the number of truck trips that are expected from past, present and future industrial warehouse development in the City.

C. Air Quality Impacts

In terms of whether the GPU exceeds an applicable air quality threshold of significance – *i.e.*, whether the Project will conflict with an applicable air quality plan – the DEIR claims that impacts are less than significant because it asserts that, “buildout of the 2021 GPU would result in a decrease in emissions when compared to buildout of the existing 2006 General Plan. Therefore, buildout of the project would not exceed the assumptions used to develop the AQMP...”. (DEIR p. 4.3-14) The DEIR incredibly claims that the buildout of the GPU would “decrease the amount of commercial and industrial space compared to the existing 2006 General Plan.” (DEIR p. 4.3-13) Without more information, this statement cannot be reconciled with the reality that the WLC project, approved August 2015, will alone consist of over 40 million square feet of new warehouse distribution space.

Indeed, since 2006, the City has approved a multitude of industrial warehouse projects within the subject GPU Planning Area. Many of these distribution or “logistics” warehouse projects were approved by way of amendment to the 2006 General Plan. The GPU is not “consistent” with the AQMP, as the latest version of the AQMP is ostensibly reliant upon the land use plan presented in the 2006 GPU which does not account for subsequent general plan amendments which have served to allow more intense uses than envisioned by the 2006 General Plan.

The DEIR cannot flatly claim that impacts of the GPU Project are less than significant *compared to the existing 2006 General Plan* without more discussion and explanation. For instance, in the area of NOx emissions, DEIR Table 4.3-4 states that mobile emissions under the Existing 2006 General Plan (2040) are 2,032 lbs/day. Under the GPU, the DEIR asserts that NOx emissions are 1,993 lbs/day. As a result, the DEIR claims that with buildout of the GPU there is actually a *decrease* in NOx emissions (by 39 lbs/day). However, this number of 2,032 lbs/day assumes that growth has remained consistent with the 2006 General Plan, which is not the case. The City's approval of numerous warehouse projects have resulted in greater cumulative NOx emissions than assumed by the 2006 General Plan. And, in almost each case, the EIR for the approved warehousing project, whether or not approved by a general plan amendment, concludes that NOx impacts are significant and unmitigable (*see*, Exhibit 1 – except of MV Logistics Center EIR). If individual projects will generate significant NOx emissions, it logically follows that, cumulatively, impacts will also be significant. Moreover, it appears that the 2006 General Plan assumed, at maximum, 46,408 square feet of “business park/industrial” development (Exhibit 2 hereto - except of 2006

General Plan), while the City has approved more than 50 million square feet of such development since 2006 (*see*, project list below). Again the 2006 General Plan is not an appropriate baseline for analysis of impacts.

The conclusions of DEIR Table 4.3-4 are dubious at best as it is implausible that air quality impacts are less than significant under buildout of the Planning Area inclusive of all built and reasonably foreseeable planned development since the 2006 General Plan. (*See* p. 4.30-14, Table 4.304) At full buildout, the WLC will generate NOx emissions of 3,064 lbs/day, vastly exceeding the SCAQMD threshold of 55 lbs/day. (Exhibit 3 – except of WLC DEIR). The DEIR is inherently inconsistent where the document actually states that: “Pollutant emissions from buildout of all land uses within the Planning Area would far exceed project-level SCAQMD Significance Thresholds.” This is a finding of significance and all feasible mitigation must be adopted. The DEIR’s conclusions under sections 4.3.6.2 (b), 4.3.6.3 and 4.3.7.2 (b) are not based on substantial evidence. The DEIR must make a finding of significance, and, in accordance with CEQA, adopt all feasible mitigation for significant air quality impacts.

The DEIR describes that the City will increase industrial square footage by 45,935,324 square feet under the buildout scenario. In a glaring omission, the DEIR does not disclose the number of diesel truck trips inclusive of all projects approved pursuant to general plan amendments since 2006, including the additional 45,935,324 square feet of industrial warehouse space that will be added to the Planning Area, plus the additional trips associated with reasonably foreseeable future industrial warehousing located in, for instance, the new “Business Flex” land use designation that would allow these uses¹. The City has not made a good faith effort at CEQA compliance where, on the one hand, the DEIR acknowledges that emissions would “far exceed project-level” thresholds of significance but the City fails to calculate and disclose the impacts with any specificity; nor does the DEIR propose even one mitigation measure for the impact. Moreover, the conclusion that the GPU project has less than significant impacts, despite exceeding air quality standards, because of alleged conformance with the AQMP is based on a specious premise – *i.e.*, that growth has remained constant and consistent with the AQMP, which it has not as discussed above.

It must be remembered that the WLC will develop one of the largest industrial warehouse campuses in the country with square footage equal to more than 700 football fields. It will generate approximately 71,085 daily vehicle truck trips. (Exhibit 4 hereto – except of WLC DEIR). Since 2009, Moreno Valley has approved at least the following industrial warehouse projects that serve as “distribution” centers for consumer goods; these

¹ The City of Moreno Valley is actively working to grow industrial warehouse/logistics development; the City has a dedicated entity in order to attract these projects.
<https://www.morenovalleybusiness.com/industrialbusinesscouncil/> and,
<https://4f9sdr2sagfrhh6in4es6doa-wpengine.netdna-ssl.com/wp-content/uploads/2017/05/Industrial-Logistic-Developer-Business-Council-2017-1.pdf>

projects are appropriately considered part of the southern-California “goods movement” network², thus they are truck intensive uses:

- March Business Center (2009) - **1,484,407** square feet of industrial warehouse space on 66.9-acres with GPA
- Master Plot Plan PA07-0035 (2010) - **409,598** square foot industrial warehouse
- West Ridge Commerce Center (2011) - **937,260** square foot warehouse distribution building
- VIP Moreno Valley Project (2012) - **1,616,133** square foot warehouse space
- First Inland Logistics Center II Project (2013) - **400,130** square feet warehouse space
- First Nandina Logistics Center Project (2014) - **1,450,000** square feet warehouse space
- Prologis Eucalyptus Industrial Park Project (2015) - **2,244,419** square feet of warehouse uses including GPA changing land use designations from residential to Light Industrial
- World Logistics Center (2015) - **40.6 million** square feet of warehouse logistics development on 3,918 acres in eastern Moreno Valley
- Indian Street Commerce Center Project (2016) - **446,350** square feet of warehouse space
- Moreno Valley Logistics Center (2016) - **1,736,180** total square feet of warehouse space
- Brodiaea Commerce Center (2017) - **262,398** square foot warehouse including a rezone from Business Park-Mixed Use to “Light Industrial”
- Moreno Valley Business Park (2021) - **220,390** square feet of warehouse logistics development including a GPA to change land use designation from commercial to “Light Industrial.”
- Moreno Valley Trade Center *under review; proposal for an industrial warehouse comprising 1,332,380 square feet to include a GPA from residential to “Light Industrial”.

Each of these projects must be included in the analysis of the GPU’s environmental impacts as they are cumulative projects, and the GPU project is, by its nature, a programmatic document that evaluates the broad environmental effects anticipated from the buildout of the Planning Area. The DEIR cannot examine isolated components of the buildout, particularly as the programmatic EIR will be relied upon by future project-specific EIRs. Currently the DEIR proposes not a single air quality mitigation measure based on the erroneous conclusion that the buildout of a Planning Area with more than 45 million square feet of industrial space, more than 10% of the Planning Area, will have less than significant air quality impacts.

² <http://www.moval.org/cdd/documents/about-projects.html>

The DEIR defers analysis of impacts where it asserts that future projects will reduce their respective impacts based on implementation of the “goals, policies, and recommendations of the 2021 GPU.” But the GPU DEIR lacks analysis of air quality impacts of the buildout of the Planning Area, and it contains nothing enforceable by way of mandatory mitigation measures. To the extent that these future projects are able to merely demonstrate “conformance” with the GPU, they may avoid mitigation of impacts altogether. The GPU DEIR is effectively structured to allow avoidance of CEQA mitigation for future implementing projects. This is not the intent of CEQA even with respect to “programmatic” documents.

An EIR’s central purpose is to identify a project’s significant environmental effects and then evaluate ways of avoiding or minimizing them. Pub. Res. Code §§ 21002.1(a), 21061. The lead agency must also adopt *any* feasible mitigation measure that can substantially lessen the project’s significant environmental impacts. Pub. Res. C. § 21002; Guidelines, § 15002(a)(3). This is most essential when the project is a program EIR. The program EIR “[a]llows the lead agency to consider broad policy alternatives and program wide mitigation measures at any early time when the agency has greater flexibility to deal with basic problems *or cumulative impacts*.” Guidelines, § 15168 (b)(4) (emphasis added).

In accordance with CEQA, the City must impose enforceable mitigation measures particularly measures to address tail pipe emissions insofar as the majority of the Project’s significant air quality emissions are attributable to mobile sources. It is estimated that NOx emissions will need to be reduced by approximately two-thirds by 2023 and three-quarters by 2030 to meet applicable emission reduction targets.³⁴ According to the SCAQMD’s Blueprint for Clean Air (2016), the southern California air basin will require approximately a 65 percent reduction in NOx emissions, *above and beyond existing measures*, to meet air quality standards.⁵ Hence the City must require the Project to utilize the cleanest available truck technologies. The Project should establish fleet efficiency requirements for vehicle fleets particularly for any future industrial projects. This should include, at a minimum, requirements that industrial tenants shall use exclusively zero emission light and medium-duty delivery trucks and vans; shall use only zero emission service equipment such as forklifts and yard trucks; and shall use near-zero and zero-emission technologies in heavy-duty applications such as “last mile delivery.” As the State moves toward its goal of zero emission goods movement, the City must ensure that the Project is in line with this important objective by also requiring the phase-in of zero emission or clean technology for heavy duty trucks. According to CARB, actions to deploy both zero emission and cleaner combustion technologies will be essential to meet air quality goals in California particularly with respect

³ <http://rtpscs.scaq.ca.gov/Documents/2012/final/f2012RTPSCS.pdf>

⁴ <https://www.aqmd.gov/docs/default-source/Agendas/aqmp/white-paper-working-groups/wp-blueprint-draftfinal.pdf?sfvrsn=4>

⁵ <https://www.aqmd.gov/docs/default-source/Agendas/aqmp/white-paper-working-groups/wp-blueprint-draftfinal.pdf?sfvrsn=4>

to goods movement⁶. The Project must be fully consistent with SCAG’s 2012-2035 Regional Transportation Plan (“RTP”) including the RTP’s “regional commitment for the broad deployment of zero- and near-zero emission transportation technologies in the 2023-2035 time frame and clear steps to move toward this objective.”^{7 8 9} The RTP states,

it is estimated that NOx emissions will need to be reduced by approximately two-thirds in 2023 and three-quarters in 2030. This is a daunting challenge. The level of emission reduction required is so significant that 2030 emissions forecasted from just three sources—ships, trains, and aircraft—would lead to ozone levels near the federal standard. Because most sources, including cars and factories, are already controlled by over 90 percent, attainment of ozone standards will require broad deployment of zero- and near-zero emission technologies in the 2023–2035 time frame. *See, id.*

Additional, feasible mitigation for operational air quality impacts includes the phase-in of electric, hybrid electric, hydrogen electric, or battery operated (*i.e.*, non-diesel) trucks. The GPU should be conditioned to adopt a “Diesel Minimization Plan” whereby zero emission trucks are phased in for all applicable projects, *e.g.*, 10% of truck fleets shall use zero emission technology by 2030, and increase that percentage by 10% per year, until 100% of trucks operating on sites are zero emission. Non-diesel trucks are expected to be deployed in the commercial market and are therefore feasible within the life of the Project.¹⁰
^{11 12} For instance, Volvo Trucks demonstrated Class 8 battery-electric trucks in February 2020. *See, id.* The Ports of Long Beach and Los Angeles have a firm goal of transitioning to zero emission technology.¹³ *See also*, article describing AQMD studying and working with manufacturers to develop zero emission Class 8 trucks¹⁴; article describing CARB using cap and trade funds to work with manufacturers to “accelerate the market for next generation of clean, heavy-duty trucks and buses, both those that run on electricity and on hydrogen”¹⁵. In short, zero emission vehicles (ZVE’s) are a priority in California.¹⁶

A mitigation measure is feasible if it can be achieved in a reasonable period of time. Guidelines, § 15364. The GPU Project should, at a minimum, require implementing projects

⁶ <https://ww3.arb.ca.gov/planning/sip/2016sip/2016mobsrsrc.pdf>

⁷ http://rtpscscs.scag.ca.gov/Documents/2012/final/2012fRTP_ExecSummary.pdf

⁸ http://rtpscscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_VehicleTechnology.pdf

⁹ <http://rtpscscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf>

¹⁰ <https://www.greenbiz.com/article/8-electric-truck-and-van-companies-watch-2020>

¹¹ <https://www.truckinginfo.com/341895/volvo-to-start-selling-electric-class-8-truck-here-at-end-of-2020>

¹² <https://arstechnica.com/cars/2020/02/charging-into-the-mainstream-volvo-electrifies-its-first-class-8-truck/>

¹³ <https://kentico.portoflosangeles.org/getmedia/a2820d01-54f6-4f38-a3c5-81c228288b87/2017-final-caap-update>

¹⁴ <http://www.aqmd.gov/home/library/public-information/2016-news-archives/dravage-trucks>

¹⁵ <https://www.arb.ca.gov/newsrel/newsrelease.php?id=915>

¹⁶ http://www.energy.ca.gov/renewables/tracking_progress/documents/electric_vehicle.pdf

to reevaluate, at periodic intervals, whether some portion of the fleet serving must be zero emission or battery powered. The Governor’s 2016 ZEV Action Plan (October 2016) identifies as a priority “Making ZEV technologies commercially viable in targeted applications the medium-duty, heavy-duty, and freight sectors”. *Id.* Therefore, it is feasible, practical, and necessary to require the use of alternatively fueled trucks presently or at some reasonable time in the future. As goods movement is a major source of emissions that contribute to regional NOx emission levels, steps must be taken to address NOx emissions apart from compliance with existing and future regulations related to diesel engine technology.¹⁷ Again the DEIR tacitly admits that air quality impacts are significant.

The Project should also incorporate the policies and goals of the State’s Zero Emission Vehicle (ZEV) Action Plan and Executive Order B-48-18 (calling for a target of 5 million ZEVs in California by 2030) where these plans and rules call for increasing the availability of electric vehicle charging stations and other zero-emission vehicle infrastructure *including direct current fast chargers*.¹⁸ EV charging infrastructure is a critical mechanism to help California reach its climate and EV adoption goals by providing opportunities at homes and workplaces as well as overcoming the critical challenge of “range anxiety” associated with EV purchase by consumers.¹⁹ As such, the Project should include requirements of *installation* of electric vehicle supply equipment (EVSE) *charging stations* at public and private facilities. Additional air quality mitigation may include requirements for funding for installation of air filtration units in homes impacted by implementing projects.

D. Greenhouse Gas Emissions

The WLC alone will generate 751,787 MTCO₂e/year (Exhibit 5- excerpt of WLC DEIR). It is inconceivable that the GPU project—that is, the buildout of the Planning Area—will not generate GHG emissions above significant thresholds. The analysis of the GHG emissions is, by its nature, an evaluation of a project’s cumulative contribution to GHG impacts. The GPU project cannot, therefore, be viewed in isolation in terms of any alleged “limited” land use changes presented by the GPU; that is, the totality of the buildout of the General Plan, as the GPU will replace the existing General Plan, must be fully disclosed, evaluated, and mitigated pursuant to CEQA. The conclusion of less than significant is unsupported. Moreover, the reader cannot discern the assumptions used to conclude that GHG impacts will be less than significant, such as the number of vehicle trips, including heavy duty diesel truck trips, that were used to calculate mobile emissions. As mobile emissions are the largest contributor to GHG emissions, the data underlying the conclusions must be fully disclosed.

¹⁷ http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GoodsMovement.pdf

¹⁸ <https://business.ca.gov/industries/zero-emission-vehicles/zev-action-plan/>
<https://www.ca.gov/archive/gov39/2018/01/26/governor-brown-takes-action-to-increase-zero-emission-vehicles-fund-new-climate-investments/index.html>

¹⁹ <https://caletc.com/wp-content/uploads/2019/10/CALGreen-2019-Supplement-Cost-Analysis-Final-1.pdf>

One of the most glaring failures of the DEIR is the lack of enforceable mitigation with respect to reducing GHG emissions. It has been repeatedly stated that actions by local governments are key to addressing the problem of global climate change.

The DEIR and CAP do not demonstrate that GHG emissions are mitigated to a level of less than significant as claimed, as many of the general plan “policies” are not enforceable. CEQA requires that mitigation measures must be “fully enforceable through permit conditions, agreements or other measures” so “that feasible mitigation measures will actually be implemented as a condition of development.” *Federation of Hillside & Canyon Ass’ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261. In addition, CEQA prohibits the deferred formulation of mitigation measures. Guidelines § 15126.4 (a)(1)(B). The policy measures that are relied upon to purportedly reduce GHG emissions to levels of less than significant are, in most cases, permissive rather than mandatory, meaning they are not enforceable, and many are impermissibly deferred. As a purported qualified greenhouse gas reduction plan, the proposed GPU must meet the requirements for all first-tier documents and impose enforceable requirements with defined performance standards. Because future discretionary projects will rely on the GPU, and any “group of measures, including performance standards” to achieve the specified reductions and forgo further CEQA GHG emission analysis, the GPU’s reduction measures must be considered mitigation measures for purposes of CEQA and must therefore comply with CEQA requirements. The DEIR states “[i]f the proposed CAP is adopted, projects that demonstrate consistency with the 2021 GPU and CAP would be subject to a streamlined CEQA review process for mitigation of GHG emissions, pursuant to CEQA Guidelines Section 15183.5. (DEIR p. 3-22).

The DEIR states, “the City would need to reduce emissions by 316,385 MTCO₂E in order to achieve the 2040 emissions target and be consistent with the 2017 Scoping Plan and Statewide goals.” (DEIR p. 4.8-15). The EIR asserts that the proposed CAP’s “strategies” would reduce GHG emissions below the standards established in CARB’s 2017 Scoping Plan and would reduce impacts below levels of significance. However, to the extent that many of the measures within DEIR Table 4.8-6 are permissive and illusory, the “mitigation program” is ineffective within the meaning of CEQA. The DEIR must be updated to include enforceable GHG emission reduction strategies that are verifiable in terms of ensuring that the asserted reductions in GHG emissions will be achieved in any real sense.

For instance, proposed measure TR-3 states that the City will “encourage” businesses to implement Transportation Demand Management Strategies, and the DEIR claims a reduction of 50,932 MTCO₂E per year based on purported implementation of this measure. TR-4 states the City will create a Transportation Demand Management Program for City staff to “promote” alternative modes of transportation “to the greatest extent possible.” TR-6 states the City will “advocate” for improvements to transit service. I-1 states the City will “actively promote” the use of “energy-efficient building operation systems” with the “goal” of achieving a 40% energy reduction in 30 percent of industrial square footage, and the DEIR

claims a reduction of 38,416 MTCO₂E based on the alleged implementation of this measure. These and other measures in Table 4.8-6 are unenforceable, vague, and illusory because they do not require the implementation of the measure. Moreover, many of the measures could be read as requiring nothing more than conformance with existing regulations, such as compliance with the “energy efficiency” requirements of CalGreen/Title 24. For instance, there is no requirement that new development shall utilize renewable energy sources for some portion of its energy demand, such as solar power energy for new warehouse projects. Achieving “energy efficiency” is not an enforceable standard, and it could mean that projects simply employ the minimum Code requirements. In short, the City has failed to propose enforceable mitigation for significant GHG impacts.

The State of California has committed to aggressive goals for the reduction of the emissions causing global climate change. Executive Order S-3-05 establishes a 2030 target of a 40 percent GHG reduction below 1990 levels; Executive Order S-3-05 establishes a GHG emission reduction target of 80% below 1990 levels by 2050; and Executive Order B-16-2012 establishes a target for the reduction of GHG emissions from the transportation sector of 80% below 1990 levels by 2050. Given the State’s commitments for reductions of GHG emissions, the City is obligated to identify and adopt all feasible mitigation measures to mitigate significant GHG impacts. Guidelines, § 15126.4.

There are numerous mitigation measures available to reduce GHG emissions. For instance, the City should consider measures from the California Air Pollution Control Officers Association’s (“CAPCOA”) *CEQA & Climate Change* (January 2008) document,²⁰ including those in Table 16: MM T-2, MM T-14, MM T-19, MM D-15, MM E-5, MM E-6, MM E-8, MM E-10, MM E-11, MM E-12, MM E-13, MM E-14, and MM E-15. The transportation sector is the largest source of GHG emissions, accounting for roughly 29 percent of GHG emissions in the United States in 2019²¹ and over 40 percent of California’s CO₂ emissions (the largest component of GHGs)²². The DEIR confirms that transportation is the largest source of GHG emissions (*see*, Table 4.8-5). The Project must incorporate enforceable transportation measures to reduce fuel use in cars and trucks including reducing vehicle miles traveled (“VMT”). Some example of measures aimed at reducing VMT include: providing carpool incentives to employees, such as free parking, preferred parking or implementing a reward program for carpooling²³; providing free, low-cost monthly transit passes to employees²⁴; creating an online ridesharing program that matches potential

²⁰ <http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf>

²¹ <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions#:~:text=The%20primary%20sources%20of%20greenhouse.share%20of%20greenhouse%20gas%20emissions.>

²² <https://ww2.arb.ca.gov/ghg-descriptions-sources#:~:text=Transportation%20is%20the%20single%20largest.CO2%20emissions%20in%20California.>

²³ <http://www.cleanairpartnerstx.org/resources/Carpool%20Incentive%20Programs%20-%20EPA.pdf>

²⁴ http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf

carpoolers through e-mail; development of a commuter trip reduction plan²⁵; transit stops²⁶; and promoting accessibility to public transit such as providing a shuttle service to transit service for employees. These types of measures that promote ride sharing and the use of public transportation are feasible mitigation for significant GHG impacts. Furthermore, a measure should be imposed requiring that projects provide the necessary facilities and infrastructure (*i.e.*, EV charging units) to encourage the use of low or zero-emission vehicles.

E. Energy Impacts

The DEIR's analysis and mitigation of the Project's energy impacts is inadequate.

First, the DEIR does not evaluate the buildout of the Planning Area with any detail that allows the reader to understand the scope of impacts. Instead, it asserts that impacts "would need to be addressed in detail at the time specific projects are proposed." (DEIR p. 4.6-7) This type of deferral is not permitted under CEQA.

Second, the DEIR's conclusions with respect to energy resources are not supported. The DEIR asserts that the Project would result in less VMT and less building energy consumption "compared to buildout of the existing 2006 General Plan." Again the DEIR fails to account for the growth since 2006 that was not anticipated under the 2006 General Plan including the WLC project. It is inconceivable that buildout of the GPU inclusive of more than 50 million square feet of industrial warehouse space will result in a reduction of VMT as well as electricity and natural gas usage compared to the buildout scenario of the 2006 General Plan. (DEIR p. 4.6-9)

Third, the DEIR tacitly acknowledges that the GPU will result in significant impacts, and mitigation is therefore required, where it states that: VMT will be greater with buildout of the Planning Area in that the Planning Area generates 3,144,986 VMT in the existing condition and buildout of the project would generate 4,524,038 VMT; and that existing industrial electricity usage is 99,77,374 kWh and the GPU project will require 754,522,614 kWh (DEIR Table 4.6-2). While the DEIR does not disclose the building area assumptions comprising the "Proposed 2021 GPU (2040)" scenario, this represents a vast increase in building energy demand, constituting a significant impact.

State CEQA Guidelines Appendix F provides that "[t]he goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: (1) decreasing overall per capita energy consumption; (2) *decreasing* reliance on fossil fuels such as coal, natural gas and oil, and (3) *increasing* reliance on renewable energy sources." (emphasis added) Appendix F puts "particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." The EIR's finding of less-than-significant with respect to energy resources is not supported insofar as the City has taken no steps towards

²⁵ [https://opr.ca.gov/docs/june08-ceqa.pdf?](https://opr.ca.gov/docs/june08-ceqa.pdf)

²⁶ http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf

energy efficiency beyond the claim that future projects will comply with regulations then in effect such as CalGreen/Title 24. Conformance with regulations and statutes such as Title 24 (CalGreen) is not sufficient to reduce impacts to a level of less than significant.

The City can - and must - do more. For instance, the current version of CalGreen/Title 24 requires solar photovoltaic (PV) panels for new homes but not commercial uses. The City must impose measures on the Project to ensure compliance with Guidelines, Appendix F and to advance the policies and goals of Senate Bill 100 which commits to 100% clean energy in California by 2045. Requiring future implementing projects to utilize solar energy for all, or some portion, of applicable future projects is one feasible means to ensure that the State can meet its energy efficiency goals. Additionally, energy efficiency measures are a feasible means to reduce the Project's significant GHG emissions. Electricity generation accounts for approximately 30% of California's GHG emissions.²⁷ Another potentially feasible mitigation measure is requiring "LEED" certification as a means to address sustainability.

F. Transportation Impacts

The DEIR concludes that the GPU project generates lesser impacts compared to the 2006 General Plan. Again the 2006 General Plan does not provide an accurate baseline to the extent that it does not include the millions of square feet of industrial warehouse space approved or in process of approval since 2006. Also, the discussion of VMT (DEIR Section 4.16.5.2) fails to properly disclose VMT associated with truck trips; it is unclear the number of truck trips used to calculate the GPU VMT. It is unclear whether "Industrial Employment" under Table 4.16-4 includes truck trips or whether this is merely employee vehicle trips. In addition, the discussion of VMT appears inconsistent with the SCAG Growth Projections for Moreno Valley (Table 4.14-1) which shows a population increase in 48,303 or a 23.2% population increase over a 22-year period (p.4-14.2). It is difficult to reconcile this population growth with the conclusion that VMT will be less under the GPU particularly when the City expects 10% of the Planning Area to be developed or occupied by industrial warehouse development.

Furthermore, the DEIR asserts the Project has incorporated VMT reducing "goals and policies to the extent feasible." (DEIR p. 4.16-34) This is insufficient. The City must adopt enforceable measures to ensure that the impacts of the GPU are fully mitigated.

G. Cumulative Impacts

An EIR must discuss significant cumulative impacts. Guidelines, § 15130 (a). Cumulative impacts are defined as two or more individual effects which, when considered together, increase environmental impacts. Guidelines, § 15355 (a). A legally adequate cumulative impact analysis views a particular project over time in conjunction with other related past, present, and reasonably foreseeable future projects. Guidelines, § 15355 (b).

²⁷ <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf>

An EIR's central purpose is to identify a project's significant environmental effects and then evaluate ways of avoiding or minimizing them. Pub. Res. Code, § 21002.1, 21061. This includes the Project's cumulative impacts.

A programmatic EIR, as here, that will be relied by future implementing projects must fully and accurately evaluate the totality of the Project's anticipated environmental impacts, *i.e.*, the project's "cumulative impacts." Without such analysis, the EIR fails as an informational document. Throughout the EIR, in almost each of the impact areas, the DEIR claims that future implementing projects will evaluate its project-specific impacts. The DEIR thus avoids analysis and mitigation of impacts, when it is precisely at this stage that such analysis is necessary to ensure that the "cumulative" effects of the GPU buildout are appropriately considered. It is *only* at this stage that the cumulative impacts associated with the totality of the subject project will be appropriately considered.

H. Growth Inducing Impacts

Amending the land use designations of the area north of State Route 60 (west of "World Logistics Prkwy") to Highway Office/Commercial will result in potentially significant growth inducing impacts that have not been fully evaluated and mitigated. Much of the surrounding area is currently served by septic systems. If the area is converted to "highway/commercial" uses, the area will be subject to the development of infrastructure and utilities (roads, sewer and water utilities, etc.) that may induce growth in the surrounding rural areas.

I. The City Must Adopt the Environmentally Superior Alternative

To ensure that alternatives are properly assessed and considered, CEQA "contains a 'substantive mandate' requiring public agencies to refrain from approving projects with significant environmental effects if 'there are *feasible alternatives* or mitigation measures' that can substantially lessen or avoid those effects'." *County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 98 (emphasis added); Pub. Res. Code § 21002. A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. Public Resources Code §§ 21081 (a), 21081.5; Guidelines, §§ 15091 (a)(3), 15092. Rejected alternatives must be "truly infeasible." *City of Marina v. Bd of Trustees of Calif. State Univ.* (2006) 39 Cal.4th 341, 369 ("*City of Marina*"); *see*, Guidelines § 15364 (defining "feasible"). Absent findings of infeasibility supported by substantial evidence, the City must adopt the Redistributed Growth Alternative. This alternative would reduce VMT according to the DEIR, and therefore should be adopted as it is feasible.

J. Conclusion

For these reasons we urge the City to revise and recirculate the Draft Environmental Impact Report.

City of Moreno Valley - MoVal 2040 General Plan Update
Public Comments – Sierra Club
May 17, 2021

Sincerely,

A handwritten signature in black ink that reads "Abigail Smith". The script is cursive and fluid, with the first name "Abigail" written in a larger, more prominent hand than the last name "Smith".

Abigail Smith
Attorney for Sierra Club-San Geronio Chapter

EXHIBIT 1

Table 4.3-6 Project Peak Operational Emissions Summary

Operational Activities – Summer Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
High-Cube						
Area Source	46.46	2.70E-03	0.28	2.00E-05	1.03E-03	1.03E-03
Energy Source	0.33	2.96	2.49	0.02	0.23	0.23
Mobile (Trucks)	19.77	429.98	184.46	1.35	51.09	19.58
Mobile (Passenger Cars)	2.98	3.73	51.42	0.17	16.61	4.46
On-site Equipment	0.95	13.18	4.25	0.02	0.43	0.40
Light Industrial						
Area Source	14.99	9.80E-04	0.10	1.00E-05	3.70E-04	3.70E-04
Energy Source	0.35	3.17	2.66	0.02	0.24	0.24
Mobile (Trucks)	11.28	244.17	107.13	0.78	32.55	11.96
Mobile (Passenger Cars)	4.48	5.60	77.31	0.26	24.98	6.70
On-site Equipment	0.3801	5.27	1.70	6.34E-03	0.17	0.16
Total Maximum Daily Emissions	100.64	689.62	425.85	2.60	125.70	43.17
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	YES	YES	NO	NO	NO	NO

Operational Activities – Winter Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
High-Cube						
Area Source	46.46	2.70E-03	0.28	2.00E-05	1.03E-03	1.03E-03
Energy Source	0.33	2.96	2.49	2.00E-02	0.23	0.23
Mobile (Trucks)	20.11	447.95	194.22	1.35	51.10	19.58
Mobile (Passenger Cars)	2.78	3.94	43.52	0.16	16.61	4.46
On-site Equipment	0.95	13.18	4.25	0.02	0.43	0.40
Light Industrial						
Area Source	14.99	9.80E-04	0.10	1.00E-05	3.70E-04	3.70E-04
Energy Source	0.35	3.17	2.66	0.02	0.24	0.24
Mobile (Trucks)	11.46	254.51	111.97	0.78	32.56	11.96
Mobile (Passenger Cars)	4.18	5.93	65.44	0.24	24.98	6.70
On-site Equipment	0.38	5.27	1.70	6.34E-03	0.17	0.16
Total Maximum Daily Emissions	100.66	718.46	420.68	2.57	125.72	43.17
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	YES	YES	NO	NO	NO	NO

Source: (Urban Crossroads, Inc., 2016a, Table 3-7)

EXHIBIT 2

**TABLE 3-1
DEVELOPMENT CAPACITY OF ALTERNATIVES 1, 2, AND 3**

Land Use	Units	Quantity		
		Alternative 1	Alternative 2	Alternative 3
Residential – Single Family Detached	DU	61,758	62,922	63,004
Residential Multi-Family Attached	DU	14,662	20,402	19,724
Commercial ¹	GLA	29,677	21,908	21,908
Professional Office	GFA	21,507	19,878	18,743
Public ²	GFA	9,215	9,215	9,215
Business Park/Industrial	GFA	40,038	46,408	40,391
Park	AC	1,044	1,044	1,044
Open Space	AC	3,927	3,922	3,922
POPULATION		279,697	304,966	302,785

Sources: Urban Crossroads, *General Plan Traffic Study*, June 2004 and P&D Consultants, August 2004.

Since initiation of environmental analysis for the General Plan program, several minor land use amendments have occurred. These amendments have been processed and undergone environmental analysis separate from the General Plan program. Although these amendments are reflected on the Land Use Alternatives maps, they are not incorporated in the development capacities shown in this Table. Nearly all of the amendments are consistent with Alternative 2 and 3.

Notes:

1 – includes neighborhood, community, and regional commercial

2 – includes schools and government offices

DU- dwelling units

GLA Gross Leasable Area (Thousands of Square Feet)

STU- Students

GFA – Gross Floor Area (Thousands of Square Feet)

AC – Acres

General Plan Land Use Alternative 1 (Existing General Plan)

General Plan Land Use Alternative 1 would retain the existing land use plan. **Figure 3-2** depicts Land Use Alternative 1. Alternative 1 includes a few land use categories that were reclassified for mapping purposes: Planned Commercial, Planned Industrial and R5/Office. The Planned Commercial areas are located at the northeast corner of Day Street and Eucalyptus Avenue and the northwest corner of Oliver Street and Iris Avenue. The Planned Commercial areas are shown as Commercial on **Figure 3-2**. The Planned Industrial areas are located at the southeast corner of Theodore Street and SR 60 and the northwest corner of Alessandro Boulevard and Gilman Springs Road. The Planned Industrial areas are shown as Industrial on **Figure 3-2**. The R5/Office designation is located at the southwest corner of Elsworth Street and Cottonwood Avenue. The R5/Office area is shown as Residential/Office on **Figure 3-2**.

EXHIBIT 3

Table 4.3.U: Operational Regional Air Pollutant Emissions (Worst-Case Scenario)

Scenario	Source	Summer Emissions (pounds per day)				
		VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Buildout, 2012 Factors	Vehicles: Local	283	346	3,861	683	42
	Vehicles: Long-haul trucks	1,129	14,510	5,995	1,473	622
	Area Source	260	7	6	1	1
	Total	1,672	14,863	9,862	2,157	665
	Significance Threshold	55	55	550	150	55
	Significant Impact?	Yes	Yes	Yes	Yes	Yes

- PM₁₀ and PM_{2.5} emissions include exhaust and road dust.
- Area source emissions include natural gas, painting, and consumer products. Landscaping emissions are negligible.
- Sulfur oxides emissions are under the 150 pounds per day significance threshold and at buildout total approximately 30 pounds per day (24 for long-haul + 6 for local).

VOC = volatile organic compounds NO_x = nitrogen oxides CO = carbon monoxide PM₁₀ and PM_{2.5} = particulate matter
Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, MBA January 2013.

Emissions from the existing on-site residences and fugitive dust are not included in this regional analysis. In addition, there may be minor emissions of VOC from the fueling station, depending on what type of fuel is used. However, details regarding the fueling station are currently unknown so the emission source is not estimated.

This is a worst-case analysis because it assumes that the entire project would be built-out in 2012. The motor vehicle and truck emission factors are from 2012, which assumes a “dirtier” fleet than would be the case in later years. The emission factor models assume that later on, the average fleet would be newer as people purchase newer cars, which are more efficient and have fewer air pollutants. In addition, no reductions are taken for the model year 2010 trucks that would be accessing the project pursuant to project design features.

As identified in Table 4.3.U, operational emissions for the proposed project would exceed SCAQMD daily operational thresholds for all criteria pollutants with the exception of SO_x for the “worst-case” 2012 scenario. Table 4.3.V demonstrates that although the number of vehicles and trucks would increase year by year, the emissions do not increase dramatically because the per-vehicle emission factors decrease over time.

Table 4.3.V: Operational Regional Air Pollutant Emissions (Year by Year, pounds per day)

Year	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2014	108	388	645	3	218	25
2015	222	838	1,288	6	462	54
2016	290	1,121	1,643	8	613	72
2017	415	1,638	2,289	11	885	105
2018	554	2,215	2,957	15	1,210	107
2019	626	2,528	3,237	17	1,390	123
2020	678	2,772	3,409	19	1,533	137
2021	721	2,998	3,577	21	1,663	149
2022	733	3,064	3,524	21	1,705	153
SCAQMD Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes

- Emissions are from local vehicles, trucks, natural gas, painting, and consumer products.
- PM₁₀ and PM_{2.5} emissions include exhaust and road dust.
- Landscaping emissions are negligible.

VOC = volatile organic compounds NO_x = nitrogen oxides SO₂ = sulfur dioxide CO = carbon monoxide
PM₁₀ and PM_{2.5} = particulate matter
Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, January 2013.

EXHIBIT 4

The 2011 NAIOP provides the more accurate trip generation for the proposed project as the NAIOP study is the most comprehensive trip study performed for high-cube logistics warehouses. As shown in previously referenced Table 4.15.K, when using the NAIOP and derived trip generation rates, project trips are forecast to be lower than if the ITE trip generation rates were used. However, in order to be conservative, this EIR and the TIA utilize the ITE 9th Edition trip rates, which has the effect of overestimating project impacts. Therefore, as determined in the TIA, trip generation rates for high-cube warehouse uses (Land Use 152) as published in the 9th Edition of ITE's *Trip Generation* manual, and currently widely accepted throughout Riverside and San Bernardino Counties, are the trip rates being utilized to determine the project's traffic impacts. The project trip generation is shown in Table 4.15.L.

Table 4.15.L: Project Trip Generation of Proposed and Existing Land Uses

Land Use Type	Unit	AM Peak Hour			PM Peak Hour			ADT
		In	Out	Total	In	Out	Total	
Proposed Land Uses								
High-Cube Logistics Center (ITE 152)	KSF	0.076	0.034	0.110	0.037	0.083	0.120	1.680
Light Logistics (ITE 150)	KSF	0.237	0.063	0.300	0.080	0.240	0.320	3.560
Utilities Servicing Station (ITE 170)*	KSF	0.720	0.080	0.800	0.342	0.418	0.760	8.000
Gas Station w Convenience Store (ITE 945)	Pumps	5.08	5.08	10.16	6.76	6.76	13.51	162.78
Convenience Store (ITE 851)	KSF	33.52	33.52	67.030	26.729	25.681	52.410	737.990
Existing Land Uses								
Single-Family Dwellings (ITE 210)	DU	0.188	0.563	0.750	0.630	0.370	1.000	9.520
Utilities Servicing Station (ITE 170)*	KSF	0.720	0.080	0.800	0.342	0.418	0.760	8.000

* Note: A.M. directionality taken from table for trips/employee. Daily is assumed to be ten time peak-hour rates

KSF = Thousand Square Feet

DU = Dwelling Unit

ADT = Average Daily Trips

Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, January 2013.

The project is estimated to generate a net total of approximately 71,085 daily trips with approximately 4,672 occurring during a.m. peak hour and 5,101 occurring during the p.m. peak hour. Daily and hourly trip counts take into account only the trips generated by the project. Refinements to raw trip generation estimated using the ITE rates have been made to provide a more detailed breakdown of trips by vehicle mix, similar to the existing baseline count data. Per City of Moreno Valley standard practice, vehicle mix percentages were obtained from the City of Fontana *Truck Trip Generation Study* (August 2003), a recognized source throughout the County of Riverside and the County of San Bernardino for estimating the vehicle mix associated with industrial and warehouse uses. Although ITE provides truck trip generation information for the high-cube logistics warehouse use, these data are not considered as comprehensive as the data available in the Fontana Study nor are they specific to large warehouses/distribution centers in Southern California. As such, the vehicle-mix from the Fontana *Truck Trip Generation Study* has been applied to ITE trip generation rates in order to determine the proposed project's passenger car and truck trip generation. Table 4.15.M shows the project trips by vehicle type.

Trip distribution represents the probable starting and ending locations of traffic generated by a project. Trip distribution is heavily influenced by the geographical location of a project site in relation to local and regional land uses (i.e., the starting and ending locations), and access to a project site from the local and regional transportation system. The proposed project's trip distribution was developed for both passenger cars and trucks.

EXHIBIT 5

4.7.6 Significant Impacts

4.7.6.1 Greenhouse Gas Emissions

Threshold	Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
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Future development that could occur within the proposed project site could generate GHG emissions during both construction and operation activities. The following activities are associated with the proposed project and could directly or indirectly contribute to the generation of GHG emissions:

- **Removal of Vegetation:** The net removal of vegetation for construction results in a loss of the carbon sequestration in plants. However, planting of additional vegetation would result in additional carbon sequestration and would lower the carbon footprint of the project.
- **Construction Activities:** During construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, CH₄ is emitted during the fueling of heavy equipment.
- **Gas, Electric, and Water Use:** Natural gas use results in the emissions of CH₄ (the major component of natural gas) and CO₂ from the combustion of natural gas. Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. California's water conveyance system is energy-intensive. Preliminary estimates indicate that the total energy used to pump and treat this water exceeds 6.5 percent of the total electricity used in the State per year.¹
- **Solid Waste Disposal:** Solid waste generated by the project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees. Landfilling, the most common waste management practice, results in the release of CH₄ from the anaerobic decomposition of organic materials. CH₄ is 25 times more potent than CO₂. However, landfill CH₄ can also be a source of energy. In addition, many materials in landfills do not decompose fully, and the carbon that remains is sequestered in the landfill and not released into the atmosphere.
- **Motor Vehicle Use:** Transportation associated with the proposed project would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips.

Construction Emissions. The project would emit GHGs mainly from direct sources such as removal of vegetation and combustion of fuels from worker vehicles and construction equipment, as shown in Table 4.7.E. The GHG emissions are from all phases of construction and assume a one-time change in the carbon sequestration capacity of the land. The project may also generate construction waste, which in turn, could emit greenhouse gases. These emissions are not estimated because it is unknown how much construction waste the project would generate. The California Green Building Standards require that the project divert at least 50 percent of construction waste.

Table 4.7.E: Construction Greenhouse Gas Emissions

Year	Annual Emissions (mt CO ₂ e)
2013	95,692
2014	37,927
2015	31,634

¹ California Energy Commission (CEC), 2004. *Water Energy Use in California* (online information sheet) Sacramento, CA, August 24. Website: energy.ca.gov/pier/iaw/industry/water.html. Accessed July 24, 2007.

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Table 4.7.E: Construction Greenhouse Gas Emissions

Year	Annual Emissions (mt CO ₂ e)
2016	26,947
2017	94,510
2018	41,743
2019	34,665
2020	26,818
2021	26,818
Refrigerant installation	849
Land use change (conversion from crop to urban)	16,523
Total	434,126
Averaged over 30 years	14,471

mt CO₂e = metric tons of carbon dioxide equivalents.

Source: Table 61, MBA 2013, of year by year emissions: CalEEMod unmitigated output and summary prepared by Michael Brandman Associates (MBA 2013, Appendix A)

Source of refrigerant emissions: refrigerant spreadsheet prepared by Michael Brandman Associates (MBA 2013, Appendix A).

Source of land use change: CalEEMod output for area sources.

Operational Emissions, Worst-Case Scenario. Operational or long-term emissions occur over the life of the project. However, CEQA requires an analysis of project buildout superimposed over existing (baseline) conditions. Therefore, operational emissions for this worst-case buildout condition are shown in Table 4.7.F. The vehicle emissions in the table represent travel within the South Coast Air Basin; the long-haul trucks travel an average of 50 miles per trip and the local vehicles travel between 9.6 and 15.4 miles per trip. The emissions do not take into account project design features to reduce emissions, such as the use of model year 2010 and later medium and heavy-heavy duty trucks on the project site. As shown in the table, the project emissions are well over the SCAQMD's significance threshold of 10,000 mt CO₂e per year. Therefore, emissions are potentially significant.

The analysis presented in Table 4.7.F also represents a worst-case analysis because the emission factors do not take into account full reductions from regulation or reductions from newer trucks and cars.

Table 4.7.F: Project Operational GHG Emissions, Buildout over Existing (Worst-Case Analysis)

Source	Emissions Prior to Mitigation (mt CO ₂ e/year)
Local vehicles	85,593
Long-haul trucks	380,401
Electricity	112,888
Natural gas	1,379
Water	2,325
Waste	153,318
Refrigerants	1,412
Construction	14,471
Total	751,787
Significance Threshold	10,000
Significant Impact?	Yes



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SENT VIA E-MAIL:

May 14, 2021

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**Draft Program Environmental Impact Report (PEIR) for Proposed
Moreno Valley Comprehensive General Plan Update (MoVal 2040) Project
(Proposed Project) (SCH No.: 2020039022)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Moreno Valley is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the air quality mitigation measures and health risk reduction strategies should be included in the Final PEIR.

Based on the Draft PEIR, the Proposed Project consists of updates to the City of Moreno Valley's General Plan to develop policies and land use designations to guide future development through 2040. During this planning period, the Proposed Project anticipates a net new growth of 22,052 residential units and 50,362,604 square feet of non-residential uses such as commercial, retail, office, and light industrial uses¹.

Based on a review of the Draft PEIR and supporting documents, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. **Recommended Revisions to the Existing Air Quality Mitigation Measure:** The Draft PEIR includes an air quality mitigation measure (MM AQ-1), which requires future development projects prepare and submit project-level construction air quality impacts analyses and mitigation measures². South Coast AQMD staff recommends that the Lead Agency include additional information on subsequent, project-level localized air quality impacts analyses and construction mitigation measures for cleaner off-road and on-road construction equipment that can and should be implemented by future development projects as part of MM AQ-1 in the Final PEIR.
2. **Additional Project-Level Air Quality Mitigation Measures:** The Draft PEIR serves as the first-tier, programmatic level analysis that can provide guidance to subsequent, project-level environmental analyses. To facilitate this, South Coast AQMD staff recommends

¹ Draft PEIR. Chapter 3 Project Description. Pages 3-26 to 3-27.

² Draft PEIR. Chapter 4.3 Air Quality. Pages 4.3-25 to 4.3-26.

that the Final PEIR include additional project-level mitigation measures for on-road mobile sources in the Final PEIR.

3. Health Risk Assessment for Future Sensitive Land Use Development Projects Near Freeways and Other Sources of Air Pollution and Health Risk Reduction Strategies: In the Draft PEIR, the Proposed Project would result in new development of sensitive land uses within 500 feet of freeways such as State Route 60³. To provide guidance for subsequent, project-level environmental analyses, South Coast AQMD staff recommends that the Lead Agency include a discussion on mobile source health risk assessments and health risk reduction strategies in the Final PEIR.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Air Quality Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
RVC210406-01
Control Number

³ Draft PEIR. Chapter 4.3 Air Quality. Pages 4.3-19 to 4.3-20.

ATTACHMENT

1. Recommended Revisions to the Existing Air Quality Mitigation Measure

In the Draft PEIR, the Lead Agency included a project-level air quality mitigation measure (MM AQ-1) that future development projects can and should implement. South Coast AQMD staff recommends that the Lead Agency incorporate the following revisions to MM AQ-1 in the Final PEIR. The recommended revisions will provide more details on subsequent, project-level localized air quality impacts analyses and mitigation measures for cleaner construction equipment and facilitate CEQA streamlining and tiering as an option from the Final PEIR by subsequent, project-level environmental analyses, where appropriate. The recommended additions and changes to MM AQ-1 are shown in underline and ~~striketrough~~, respectively.

CEQA Air Quality Localized Significance Thresholds Impact Analysis

South Coast AQMD has developed localized significance thresholds. Future development projects should evaluate and quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA localized significance thresholds (LSTs)⁴ to determine the level of significance for the projects' localized air quality impacts. The localized CEQA air quality impact analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

Air Quality Mitigation Measures for Cleaner On-Road and Off-Road Construction Equipment

AQ-1: Applications for future development, wherein the Director of Community Development or his or her designee has determined a potential for air quality impacts associated with construction, shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The Director of Community Development or his or her designee shall make this determination based on the size of the project, whether the project would require a transportation impact analysis, or other criteria. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality regional and local impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's adopted regional and localized construction CEQA thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:

- Require fugitive-dust control measures that exceed SCAQMD's Rule 403 requirements, such as:
 - Use of nontoxic soil stabilizers to reduce wind erosion.
 - Apply water every four hours to active soil-disturbing activities.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

- Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Require that construction equipment equal to or greater than 50 horsepower be electrically powered or alternatively fueled. At a minimum, require the Use of construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 Final (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. Include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. Require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 Final engine certification, the project representative or contractor must demonstrate through future studies with written findings supported by substantial evidence that is approved by the lead agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.
- Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board (CARB)'s adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), and ensure that supportive infrastructure will be available for ZE/NZE trucks. At a minimum, require the use of 2010 model year⁵ that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the future development projects, the lead agency should require that operators maintain records of all trucks associated with the future development projects' construction and make these records available to the lead agency upon request. The records will serve as evidence to prove

⁵ CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

that each truck called to the future development projects during construction meets the minimum 2010 model year engine emission standards. Alternatively, the lead agency should require periodic reporting and provision of written records by contractors working on the future development projects and conduct regular inspections of the records.

- Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limit nonessential idling of construction equipment to no more than five consecutive minutes.
- Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour.
- Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.
- Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the SCAQMD's website.

2. Additional Project-Level Air Quality Mitigation Measures

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate significant adverse impacts. The Proposed Project is a blueprint for the City's future development. The Draft PEIR for the Proposed Project serves as the first-tier, programmatic level analysis that can provide guidance to subsequent, project-level environmental analyses. Therefore, South Coast AQMD staff recommends that the Lead Agency include the following project-level mitigation measures in the Final PEIR to further reduce emissions from on-road mobile sources by future development projects that generate and attract heavy-duty diesel-fueled trucks. These mitigation measures will facilitate implementation of the Proposed Project's Environmental Justice Actions (EJ. 1-D⁶ and EJ. 1-E⁷) and support the efforts in implementing the control measures and strategies identified in the 2016 Air Quality Management Plan⁸.

Project-level air quality mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider and include in the Final PEIR for future distribution and warehouse development projects may include the following:

- To facilitate implementation of the Proposed Project's Environmental Justice Action EJ.1-D, which requires the City of Moreno Valley work with the distribution and warehousing business community to plan for zero emission trucks and vans, the Lead Agency should require the use of ZE or NZE heavy-duty trucks by future distribution and warehouse development projects during operation such as trucks with natural gas engines that meet CARB's adopted optional NOx emission standard of 0.02 g/bhp-hr, if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean

⁶ Draft MoVal 2040 General Plan, Section 8 Environmental Justice. Page 8-9.

⁷ Draft MoVal 2040 General Plan, Section 8 Environmental Justice. Page 8-9.

⁸ South Coast Air Quality Management District. 2017, March. Final 2016 Air Quality Management Plan. <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>

Trucks Rule⁹ and the Heavy-Duty Low NOx Omnibus Regulation¹⁰, ZE and NZE trucks will become increasingly more available to use, especially through. The Lead Agency can and should require future distribution and warehouse development projects to have a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs. At a minimum, require the use of 2010 model year¹¹ that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of PM and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Require future distribution and warehouse development projects to include an evaluation of sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the subsequent, project-level environmental analyses, where appropriate. Future distribution and warehouse development projects can and should also include the requirement in applicable bid documents, purchase orders, and contracts. Owners and operators of future distribution and warehouse development projects shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections at the future distribution and warehouse development projects.

- Limit the daily number of trucks allowed at the future distribution and warehouse development projects to the levels analyzed in the subsequent, project-level environmental analyses for these projects. If higher daily truck volumes are anticipated to visit the site, additional analysis should be done through CEQA prior to allowing this higher activity level.
- To help facilitate implementation of the Proposed Project's Environmental Justice Action EJ.1-E, which requires the City of Moreno Valley to study the feasibility of promoting electric vehicles (EV) and requiring minimum supporting EV infrastructure, the Lead Agency should use the results of the feasibility study to help inform the provision of EV charging stations or at a minimum, require future distribution and warehouse development projects to provide the electrical infrastructure and electrical panels, which should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

⁹ CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹⁰ CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

¹¹ CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

Project-level air quality mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider and include in the Final PEIR for future distribution and warehouse development projects may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Design considerations that the Lead Agency should consider and include in the Final PEIR for future distribution and warehouse development projects to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design a future distribution and warehouse development project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the project site.
- Design a future distribution and warehouse development project such that any check-in point for trucks is inside the project site to ensure that there are no trucks queuing outside.
- Design a future distribution and warehouse development project to ensure that truck traffic inside the project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the future distribution and warehouse development project site.

3. Health Risk Assessment (HRA) Analysis for Future Sensitive Land Use Development Projects Near Freeways and Other Sources of Air Pollution and Health Risk Reduction Strategies

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the lead agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways or other sources of air pollution, South Coast AQMD staff recommends that, prior to approving future development projects, the lead agency consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

HRA Analysis

Implementation of the Proposed Project would result in new development of sensitive land uses within 500 feet of freeways such as State Route 60. To facilitate implementation of the Proposed Project's Environmental Justice Policy EJ.1-3¹², which requires new development that would locate sensitive uses adjacent to sources of toxic air contaminants (TAC) to be designed to minimize any potential health risks, South Coast AQMD staff recommends that the Lead Agency

¹² Draft MoVal 2040 General Plan, Section 8 Environmental Justice. Page 8-9.

include a discussion on mobile source HRA analysis¹³ in the Final PEIR to provide guidance for subsequent, project-level environmental analyses. This discussion will demonstrate that the Lead Agency has adequately considered the potential health risk impacts from implementing the Proposed Project and that a subsequent, project-level HRA analysis will be completed to disclose health risk impacts at a later stage. Furthermore, the Lead Agency should include the following health risk reduction strategies in the Final PEIR as guidance for future sensitive land use development projects that will be sited in close proximity to freeways or other sources of air pollution.

Health Risk Reduction Strategies

Many strategies are available to reduce exposures, including, but not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters¹⁴, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final PEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to

¹³ South Coast AQMD. "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

¹⁴ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/jna.12013>.

decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended revisions to existing air quality mitigation measure and additional new air quality mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final PEIR (CEQA Guidelines Section 15091).

Chris Ormsby

From: Lindsay Robinson <lr92555@gmail.com>
Sent: Monday, May 24, 2021 11:59 AM
To: Chris Ormsby; Patty Nevins
Subject: deir comments

Warning: External Email – Watch for Email Red Flags!

Hi Chris and Patty,

Have the planning commissioners been given copies of all the letters and comments that you received regarding the flawed draft eir and biased gpu? Did they receive Attorneys Abby Smith and Rachel Howletts letters as well as the SCAQMD?

They need to read all of those as well as the residents' oppositions in order to make an educated decision.

Also is using all caps and bolding the word **APPROVE** as the staff's recommendation common practice? I don't recall that in past years.

Thank you,
Lindsay Robinson

Chris Ormsby

From: Susan Zeitz <whitwdtravel@verizon.net>
Sent: Monday, May 24, 2021 1:54 PM
To: Chris Ormsby
Subject: MoVal2040 Project Info

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Please send this back showing it was received with a time stamp and date.

May 24, 2021

Hello Chris,

I saw online that questions regarding MoVal2040 were to be directed to you. I'm having trouble finding the below information on line and would appreciate your help.

I'd also like hard copies or digital copies of all of them.

What are all the dates for the Planing Commission's meetings made reference to, or had discussions about, or made comments about, gave advise about, or made or talked about decisions regarding the General Plan Update 2040? Were all of these meetings voice or video recorded?

Who was in charge of documenting each of these meetings?

What are all the dates, and every places the meetings were held, for the General Plan Update Committee's meetings made reference to, or had discussions about, or made comments about, gave advise about, or made or talked about decisions regarding the General Plan Update 2040? and Where did each of these meetings take place? Were the meetings video or voice recorded? Who was in charge of documenting the minutes, voice, and video recordings each of these meetings?

Please send me the link where I can find the General Plan Update Committee members Names, Photos, and their applications seeking appointment as well as applications of those not appointed.

I look forward to receiving answers.

Thank you,

Susan Zeitz

26386 Ironwood Ave.

Moreno Valley, Ca. 92555

Chris Ormsby

From: Susan Zeitz <whitwdtravel@verizon.net>
Sent: Monday, May 24, 2021 5:33 PM
To: Chris Ormsby
Subject: another question

Warning: External Email – Watch for Email Red Flags!

Thank you Chris for the responses. I will research using the information you gave me.

You gave me the General Plan Update Committee members Names but who can tell me where that information can be found on the city websites?

Thank you, Susan

Please send me the link where I can find the General Plan Update Committee members Names, Photos, and their applications seeking appointment as well as applications of those not appointed. The General Plan Advisory Committee included the following members Alvin DeJohnette, Chair; Ray Baker, Vice-Chair; Joann Stephan, Member; Iddo Benzeevi, Member, Dr. Bobby Sheffield, Member, and Carlos Lopez, Member. You would need to submit a records request to the City Clerk regarding applications for the members.

I look forward to receiving answers.

Thank you,

Susan Zeitz

26386 Ironwood Ave.

Moreno Valley, Ca. 92555

Chris Ormsby

From: Oscar A. Alvarez <oscaree@aol.com>
Sent: Tuesday, May 25, 2021 9:14 AM
To: Chris Ormsby
Subject: Response to Comments from the MoVal 2040 Team regarding the GPU, HE, CAP and EIR
Attachments: MV2040 General Plan - Climate Action Plan Comments Final.docx

Warning: External Email – Watch for Email Red Flags!

Dear Chris Ormsby,

I received last night the initial responses to my comments from the MV2040 team. My comments have been provided to all the documents related to the General Plan Update, Housing Element, Climate Action Plan and EIR (MV2040), and should be treated as a whole, not as a particular response to the EIR. Further, the responses from the MV2040 staff are short-sighted and incomplete, and with complete disregard to the future health and quality of life of the residents of Moreno Valley, and with no consideration for the people already suffering from poverty and the current air quality in the City.

I respectfully request that you make available to all the Planning Commission members my response (below) to the comments I received last night, along with my detailed comments previously filed, for their full consideration.

1. CLIMATE CHANGE, FEDERAL AND STATE COMMITMENTS TO GHG MITIGATION, AND CURRENT STATE OF AIR QUALITY IN MORENO VALLEY - Climate Change has been recognized as a threat to our way of life, and that is the reason that a decreasing trajectory of GHG emissions is being recommended by federal, state and regional governmental agencies.

2. MODIFICATIONS ARE NECESSARY TO THE CURRENTLY PROPOSED MV CLIMATE ACTION PLAN CONSISTENT WITH FEDERAL AND STATE COMMITMENTS TO MITIGATE GHG EMISSIONS - *The MV2040 team response does not address the recommendations properly and fails to answer key questions.*

The response states that the emissions will inherently increase in the City due to planned growth, and that the City does not need to reduce the total mass emissions in 20 years. This is a poor vision for the future given to the City leadership. The methodology of per capita reduction actually increases total GHG emissions in 20 years, effectively disregarding that the City of Moreno Valley is located in a region that has had the worst air quality in the nation in most of the last 20 years, and the current plan as it stands, makes the air quality even worse! The City has the authority and the moral imperative to protect its residents not only from current GHG conditions, but to implement a plan that has a decreasing trajectory of GHG emissions as recommended and consistent with federal, state and regional governmental agencies, and with GHG emissions close to zero emissions by 2045. This can be done by requiring future projects to use electric vehicles/trucks and chargers, extensive use of solar panels, conversion of buildings from natural gas to electricity, effective filters, and other technology that will become available within 20 years.

3. MV UTILITY INTEGRATED RESOURCE PLAN AND CLEAN ENERGY GOALS NEED TO BE COORDINATED WITH MODIFIED CLIMATE ACTION PLAN, AND FEDERAL AND STATE COMMITMENTS AND PROJECTIONS - *The MV2040 team response does not address the recommendations and fails to answer key questions.*

The MV Utility IRP will need to be updated and coordinated with the Climate Action Plan to properly address the transformation in load of the City, and increase in demand, as the City shift into more electricity usage as a source of energy during the upcoming 20 years, as projected by federal and state governmental agencies.

4. ENVIRONMENTAL JUSTICE AND PROJECT APPROVAL PROCESS ISSUE CONCERNS - *The MV2040 team response does not properly address the recommendations and fails to answer key questions.*

By not mitigating GHG emissions and letting them increase after 20 years, the currently proposed CAP is simply disregarding the recommendations from the President of the USA and the overarching policies of the state of CA, and completely fails to provide relief to Moreno Valley neighborhoods already suffering while living in the region with the lowest quality of air in the country, and to add insult to injury, it will be worsened after 20 years! The City needs to take the

bold and necessary step to implement a modified CAP that decreases GHG emissions close to zero by 2045. It has the authority to require projects to be within this CAP, and there is no other way to fully protect its residents.

5. JOBS CREATION - *The MV2040 team response does not address the recommendations.*

Opportunities for job creation will occur in many areas, including electric vehicles and charging infrastructure, energy efficiency, extensive use of solar panels, and electrification of homes and buildings from natural gas to electricity. The City needs to prepare for this by updating the MV Utility Integrated Resource Plan for the next 20 years, and by starting to train its local workforce in these areas where jobs will predominate.

6. TREES, TREES, TREES - *The MV2040 team response does not address the recommendations.*

The City needs to establish a 3-year program to plant trees along our main boulevards, avenues and streets as they are an effective way to fight Climate Change, and bring other benefits as well.

7. BUILD CITIES FOR, NOT CARS - *The MV2040 team response does not address the recommendations and fails to answer key questions.*

The City must protect bicyclists by educating residents on the right of way, safety and respect for bicyclists, and must triple bike lanes within the next 5 years, creating a strong bicycle network - they will come, if you build them

8. SENIORS - *The MV2040 team response does not address the recommendations.*

The Senior population in CA is expected to increase around 50% by 2030. A plan needs to be in place to, amongst other things, implement new facilities and expand existing services to serve this increasing and important sector of the population.

9. CITY SHOULD PLAY A STRONGER ROLE IN HELPING WITH THE HEALTH AND FUTURE OF OUR POOR CHILDREN, AND RETHINK LIBRARY USE TO HELP MORE WITH THE OVERALL EDUCATION OF CHILDREN. *The MV2040 team response does not address the recommendations.*

A pilot program needs to be implemented by the City to assist single mothers with young children living in poverty, and libraries should provide flexible spaces and technology to assist in the education of children by providing them with 21st century skills during their free time - current technology allows for this now.

10. HOUSING CRISIS AND SOLUTIONS FOR YOUR FAMILIES. *The MV2040 team response does not address the recommendations.*

The City needs to conduct workshops for first time buyers regarding opportunities to finance their homes, and support new legislation that makes available more housing for this important sector of our population.

11. COMMUNITY CHARACTER - INCREASE AWARENESS AND PRIDE OF THE CITY BY CREATING HARMONY AND UNITY AROUND IT - *The MV2040 team response does not address the recommendations.*

Recommendations include information to be included in websites, markers in city locations, a mobile City Hall, meeting "for coffee" or "at the park" with Council members and the Mayor, and encouraging more sports and cultural events in the City.

12. GOALS AND ACTIONS - CREATING RESPONSIBILITY AND ACCOUNTABILITY - *The MV2040 team response does not address the recommendations and fails to answer key questions.*

It is important that responsibility and accountability is created and assigned to groups or departments in the City for all goals and actions developed in these proposed documents.

Thank you! - Oscar Alvarez

**MoVal 2040 (MV2040) General Plan Update (GPU), Housing Element (HE),
Climate Action Plan (CAP) and EIR Comments**

Oscar Alvarez – 5/15/21

PROLOGUE: I have been living in Moreno Valley since 1990. I have three children who grew up here, and four small grandchildren, and they all live in the area. The MV2040 GPU, HE, CAP and EIR present us with a great opportunity to meet the challenges of the present and future with innovation, determination and leadership in the County of Riverside, while we assure minimum impact on the short- and long-term quality of life and well-being of the residents in the City, and at the same time providing a sustainable future for our next generations.

My comments are provided for the April 2021 published version of the subject plans and reports, and are informed by the proposals themselves; current applicable scientific, engineering and policy reports; and my own experience obtained during my 32-year public service career for the largest municipal utility in the country in the areas of system resilience, reliability and planning.

My comments balance the City's "objectives of economic growth, ample housing options, livability, and stewardship of environmental resources" with the overarching core values of the City: to safekeep a healthy and self-sustaining environment, protect and promote the health and well-being of current and future generations, and to fully promote democracy and encourage citizen involvement.

I believe my comments, respectfully submitted, are consistent with these objectives and core values, will help my children and grandchildren lead a healthier and better life, and will make the City better place to live in the future.

Summary of Comments

1. CLIMATE CHANGE FACTS, FEDERAL AND CALIFORNIA COMMITMENTS TO GREENHOUSE GAS (GHG) EMISSIONS MITIGATION, AND CURRENT STATE OF THE AIR QUALITY IN MORENO VALLEY – The UN Intergovernmental Panel on Climate Change Report requires the world to maintain increase of temperature within 1.5 degree Celsius (to avoid irreversible damage to the planet) by cutting in half fossil emission by 2030, and becoming carbon neutral by 2040 (or 2050 with a greater risk to fail).

In May 2021, the EPA reported in its latest data that global warming is making life harder for Americans, and threatens their health, safety, communities and way-of-life. The combination of rising temperatures and melting polar ice is causing sea levels to rise on the East Coast and Gulf Coast; in some areas the sea levels rose more than 8 inches from 1960 to 2020, the number of days when water has inundated communities has increased, and the rate of flooding is accelerating.

In April 2021, the American Lung Association issued its “State of the Air 2021” report, which continues to find San Bernardino, Riverside and Los Angeles counties ranking first, second and third as the nation’s smoggiest counties, and have had the worst air quality for most of the last 20 years.

The CalEnviroScreen tool shows that Moreno Valley already experiences heavy burdens of pollution and vulnerabilities, including ozone, PM2.5 and diesel particulate matter levels of burden that contribute to asthma, lung cancer, high blood pressure and cardiovascular disease (heart attacks and strokes). All of us living in Moreno Valley suffer with this unhealthy air, but even worse, people of color are two or three times more likely to be breathing the most polluted air than (are) white people

In April 2021, President Biden committed the nation to reduce GHG emissions from by 50-52% below 2005 levels by 2030. The State of CA has already an overall goal of carbon neutrality by 2045, with intermediate steps.

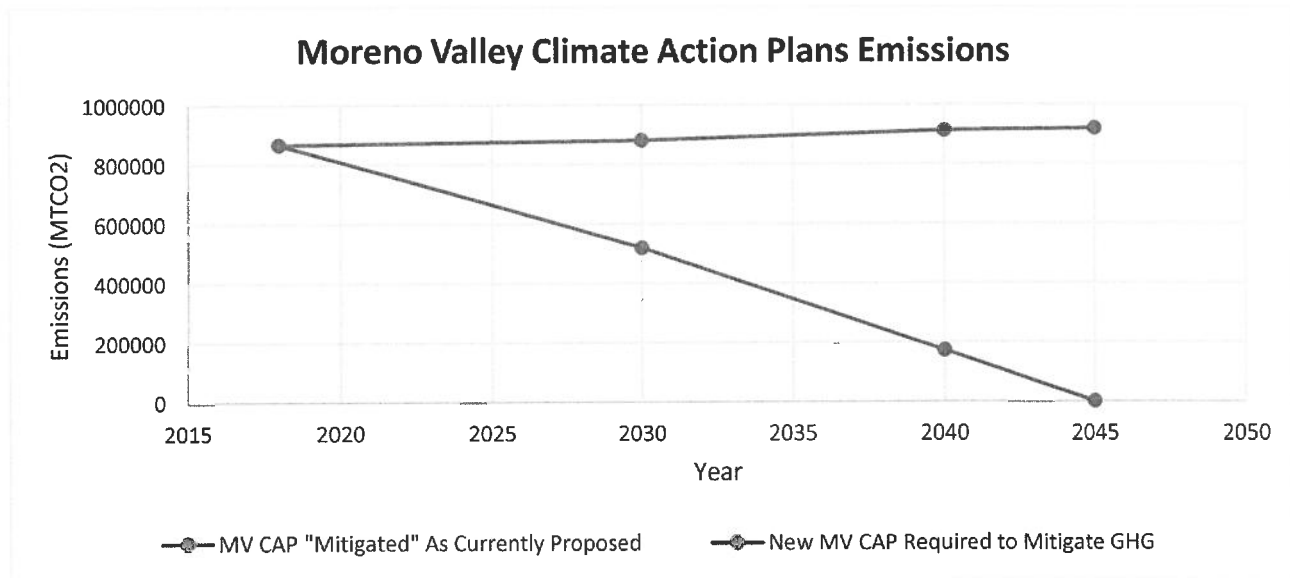
In May 2021, the South Coast Air Quality Management District approved the Warehouse Indirect Source Rule (PR 2305) which requires warehouses, and indirectly diesel-fueled trucks serving them, to cut chronic air pollution linked to asthma, cancer and deaths in Los Angeles, Orange, Riverside and San Bernardino counties. The district report on the rule confirms what we already know: diesel exhaust from trucks aggravates breathing problems and heart problems, and cancer, and neighborhoods close to warehouses already face substantially higher burdens of pollution than other neighborhoods, with most affected communities having higher poverty rates and the majority being Hispanics and African Americans.

2. MODIFICATIONS ARE NECESSARY TO THE MV CLIMATE ACTION PLAN TO BE CONSISTENT WITH FEDERAL AND STATE COMMITMENTS AND PROJECTIONS TO MITIGATE THE EXISTENTIAL THREAT OF CLIMATE CHANGE – Despite that Moreno Valley already experiences heavy burdens of pollution and vulnerabilities that affect very seriously the health and quality of life of its inhabitants, the current MV Climate Action Plan does not decrease the total amount of emissions in the City in 20 years. It estimates the total emission in the City at 100% in the year 2018 (866, 410 MTCO₂E), and calculates a “mitigated” total

emissions with the CAP strategies at 105.4% (913, 365 MTCO₂E) by 2040, an actual increase of about 5.4% in total emissions (See figure below).

The City of Moreno Valley has the authority and ethical imperative of requiring any proposed project to mitigate its emissions on a downward trajectory throughout the life of the project, and reaching net-zero emissions at a time certain to protect the well-being and quality of life of the Moreno Valley residents. By taking this bold and necessary action, the City leaders will protect the environment and the well-being of the people in Moreno Valley, and will implement emission mitigation approaches consistent with those requested from the United Nations Intergovernmental Panel on Climate Change, and federal and state governments.

Thus, a new MV CAP needs to be developed that approximates the downward GHG trajectory as proposed by the State of CA and president Biden commitments. The following MV CAP will mitigate GHG emissions: Baseline of 100% (866, 410 units) in 2018, 40% below 2018 (519,846 units) by 2030, 52% below 2018 (415, 876 units) by 2040, and 100% below 2018 by 2045.



The new MV CAP, as any other plan, requires corresponding project review mechanisms, including emissions measurements/projections, effective mitigation, use of on-site solutions, and monitoring progress with GHG goals on an annual basis. This plan is responsive to the needs of the residents of Moreno Valley, calls for environmental justice to vulnerable communities of color, and takes action consistent with existing scientific evidence to avert climate change disaster.

Key Questions: a) The Final EIR, GPU and new MV CAP will need to be coordinated and fully explain how the City's emissions will meet the downward trajectory as projected by federal and state goals, otherwise these documents will be inadequate; how will the City accomplish this? b) The Final EIR, GPU and MV CAP must fully explain how progress will be monitored and verified over the next 25-30 years, how will this be done specifically? c) What will be the specific steps the City will take to inform the public every two years (as recommended in Section XII) that the City is meeting its fair share of reducing Greenhouse Gases(GHG), and in what form will it be reported?

Further, investments to achieve these goals will bring jobs to MV in the areas of energy efficiency, electrification of trucks (and its charging infrastructure) and buildings; extensive use of solar panels and other renewable resources; changing homes and buildings from natural gas to electricity; smart city growth, and other advanced technological solutions that may be developed in the future and that are consistent with or better than the state and city goals. Training of workers in the fossil and other industries needs to get started now, to timely effect this transformation.

3. THE MV UTILITY INTEGRATED RESOURCE PLAN AND CLEAN ENERGY GOALS NEED TO BE COORDINATED WITH THE MODIFIED MV CAP, AND FEDERAL AND STATE COMMITMENTS AND PROJECTIONS - The State of California requires utilities to achieve 50% renewable resources by 2030 (SB 350) and 100% by 2045 (SB100). President Biden has committed the nation to reach 100% of renewable energy (carbon free energy sources) by 2035.

The MV Utility 2018 Integrated Resource Plan shows the possibility of the City to reach 100% of renewable energy by 2030, using an accelerated scenario. To achieve this goal and support GHG mitigation efforts, the City needs to update its 2018 IRP to consider the future changing demand characteristics for the next 20 years, which will include by 2040 extensive use of solar panels, electric passenger cars and charging infrastructure, appliances and heating equipment switching from natural gas to electric, potentially utility solar/wind energy and storage, and other technical and reliability matters.

Key Questions: a) What methodologies and tools will the EIR, GPU and MV Utility use to study and project the most effective investments and methodologies to use to reduce GHG emissions in our area under various assumptions, to meet the downward trajectory of state and federal goals? b) How will this be documented? c) What methodologies and tools will the EIR, GPU and MV Utility use to perform sensitivity analysis, such as allowing maximum coverage of all commercial/warehouse buildings with solar, instead of the current 50% discussed in this paper, to quantify the additional GHG emissions mitigation for our City and region?

It should also investigate building its own renewable energy resource(s), to energize the City 100% by 2030, or earlier. Excess energy could be sold to the market for additional revenue. Clearly, this energy transition will bring extensive improvements in air quality and health across all areas in the city, both to disadvantaged and non-disadvantaged, and as the City transitions to a 100% renewable energy, many jobs will be created as further described in Sections II and V.

4. ENVIRONMENTAL JUSTICE AND PROJECT APPROVAL PROCESS ISSUE CONCERNS - Environmental justice issues should be considered and a modified CAP be implemented to mitigate GHG emissions, with trajectories consistent with the President commitment and the overarching policies of the State of CA. By taking this bold and necessary action, the City leaders will provide relief to neighborhoods already suffering from substantially higher burdens of pollution, communities that generally have higher poverty rates, and Hispanics and African Americans residents.

Key Questions: a) What are the short- and long-term plans that MV will use to reduce the number of residents living/working within state designated Disadvantage Community? B) How does the City propose to use the GPU and new CAP to monitor these plans?

Furthermore, every resident should be given a fair chance to participate in the review of proposed projects, with enough time and complete information, in their own language (at least in English and Spanish - per the US Census Bureau, MV population is around 58% Hispanic), and with the City providing responses to comments on a written basis. Too many times we have seen incomplete information provided, not enough time to review, and convoluted and confused changes to projects which make the review process difficult, if not impossible. If this process is not improved, we are making a mockery of our democratic process.

5. JOBS CREATION – As we prepare for the future, jobs should be diversified and with emphasis on healthcare, robotics, medical equipment, electric vehicles and component parts, logistics, energy efficiency, electrification of homes from natural gas to electricity, semiconductor industry, and other advanced technology developed. Balancing these jobs, emphasizing all of them, will bring prosperity to the City, and is the way to the future for our younger generations.

Also, businesses related to health (e.g. yoga studios, health food stores and supermarkets) need to be incentivized, and more regional cultural (e.g. Moreno Valley Film Festival) and sports (e.g. AYSO regional soccer tournaments) events should be coordinated and incentivized to bring people and business to the City.

6. TREES, TREES, TREES - Trees provide environmental benefits that directly improve human health and our quality of life by cleaning GHG and lung-damaging chemicals while cooling the City. As we all know, this is done by (amongst other things): absorbing NOx and SO2, capturing dust and smoke, releasing oxygen, shading building surfaces and street pavement which lowers local air temperatures, and reducing the demand for heating and A/C units.

The City needs to establish a 3-year program to plant trees along our main boulevards, avenues and streets, as they are an effective way to fight Climate Change, can work as noise barriers, and improve property values, amongst other many things.

7. BUILD CITIES FOR PEOPLE, NOT CARS – Bicycles will be one of the keys to fight Climate Change and Air Quality issues in the future. If the City of Moreno Valley makes it easier for people to walk, bike and take the bus, fewer GHG and lung-damaging chemicals will be emitted by oil-burning transportation.

The City must protect bicyclists by educating residents on the right of way, safety and respect for bicyclist; the City must also triple bike lanes within the next 5 years, creating a strong network - they will come if you build them.

Key Questions: Our City continues to be designed for cars and not people. The proposed EIR, GPU and CAP fail to significantly change this pattern. a) What significant changes will be added to the documents to make walking and riding bikes more friendly to the population, and also encourage them to use public transportation? b) How many more miles of multi-use trails will be added? c) The Final

EIR must show how close each multi-family/high density zoning is to shopping locations, and if there are sidewalks/bike paths/multi-use trails connecting them, otherwise it will be inadequate.

8. SENIORS – The City needs to plan implementation of new facilities and expanding existing and new programs to accommodate the increasing Senior population in the City (Senior population in the state is projected to increase around 50% by 2030); work and coordinate with the State to obtain additional resources to meet expected increase in demand for Senior services by 2030; and work and coordinate with county, state and federal agencies to facilitate access to the treatment of mental health (e.g. depression and loneliness) issues.

9. CITY SHOULD PLAY A STRONGER ROLE IN HELPING WITH THE HEALTH AND FUTURE OF LOW-INCOME CHILDREN, AND RETHINK LIBRARY USE TO HELP MORE WITH OVERALL EDUCATION CHILDREN - Researchers have found within the last 15 years that poverty and home struggles correlate with children’s brain development, including limiting the areas of language, impulse control, learning and memory, and the ability to avoid addictions and become a contributing member of the society. The City should establish a pilot project to help single mothers with young children living in poverty that provides them with a monthly stipend (\$100-300 for 5 years), and monitor how it helps the healthy development of their children by comparing with others not receiving the help. If it shows promise, the project can be expanded.

The City should devote certain parts of our libraries to provide our children with working spaces and technology, where they can pursue activities that encourage self-learning, curiosity, explorations and project building; this can be done with the help of staff, or in coordination with local schools. Libraries can also offer workshops and short area trips for all children in Moreno Valley so they can learn about nature, the environment, climate, science and urban development. All these actions will strengthen the possibility that we will have adults who are physically and mentally healthier, and contributing members of society.

10. HOUSING CRISIS AND SOLUTIONS FOR YOUNG FAMILIES - Conduct workshops in the City for first time home buyers on programs available at the local, state and private levels. Require developers to set apart a good percentage of units and homes for first-time, young family buyers. Pursue alliances with the state and federal government to obtain funds and loans for MV residents, and propose and/or support new legislation to attain these goals.

11. COMMUNITY CHARACTER - INCREASE AWARENESS AND PRIDE OF THE CITY BY CREATING HARMONY AND UNITY AROUND IT - The City needs to improve its community character by pursuing the following approaches: providing residents information on City activities on its website, and markers at the entrance of trails and locations with historical importance; establishing a mobile City Hall; facilitating more accessibility to the Mayor and City Council members by conducting meetings “for coffee” or “at the park” with constituents; setting banners around the City for important events or City activities (e.g. Film festivals, soccer tournaments, General Plan Update, Moreno Valley Utility prizes) – we need to “blow our horn”, and loud, otherwise the City is invisible to its residents.

12. GOALS AND ACTIONS – CREATING RESPONSIBILITY AND ACCOUNTABILITY - Goals and Actions as stated in the GPU, HE, EIR and CAP should be monitored for progress no later than every two years with public participation, and with assigned responsibility and accountability to a City Department/Group, and with measurable objectives and due dates.

Key Question: What document and process will be implemented to monitor progress of Goals and Actions as stated in the GPU, HE, EIR and CAP, no later than every two years with public participation, and with assigned responsibility and accountability, measurable objectives and due dates?

I. CLIMATE CHANGE FACTS, FEDERAL AND CALIFORNIA COMMITMENTS TO GREENHOUSE GAS (GHG) EMISSIONS MITIGATION, AND CURRENT STATE OF THE AIR QUALITY IN MORENO VALLEY

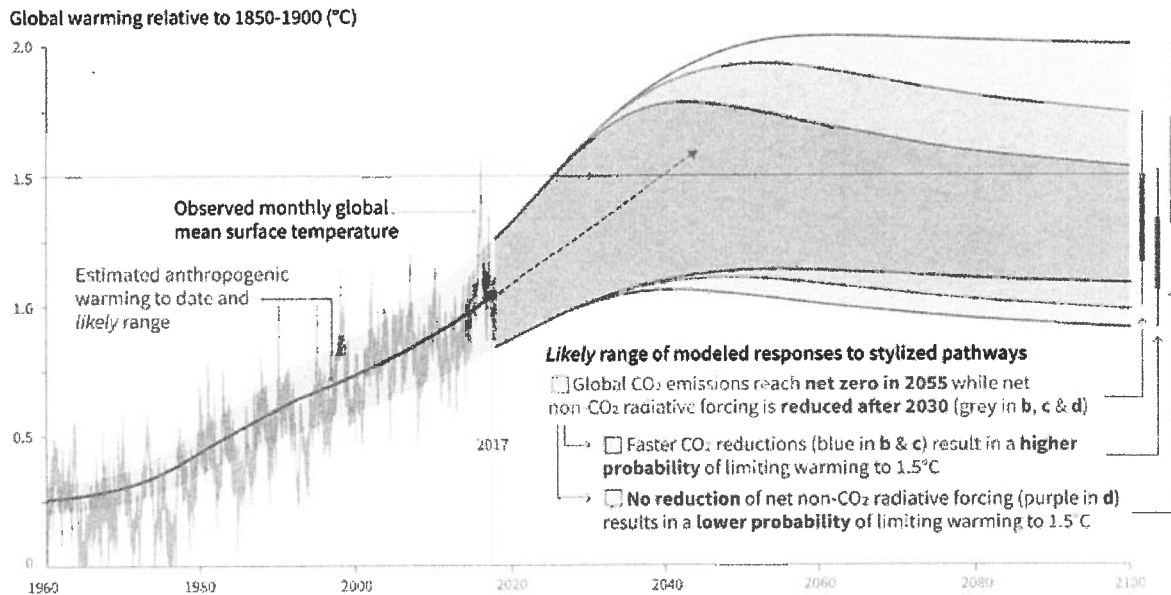
The United Nations IPCC Report and US Environmental Protection Agency Data - According to the United Nations Intergovernmental Panel on Climate Change (IPCC) 2018 Report, to avoid passing the 1.5 degrees Celsius (2.7 degrees Fahrenheit) limit over pre-industrial levels would require a "rapid and far-reaching transformation of human civilization at a magnitude that has never happened before". What is needed in the world to limit climate change is to effect sweeping changes in energy, transportation and other systems that have "no documented historic precedent".

Nevertheless, the report is hopeful that staying within the 1.5 degrees Celsius change is still possible. It is important to keep this limit in the Earth's average temperature because some places in the world have already crossed that limit, and the climate crisis is already here. These higher temperatures are already causing droughts and hunger, glaciers are melting, storms and hurricanes are getting stronger and more devastating, etc. Because of this evidence and many studies, scientists have determined that the 1.5 degrees limit may be seen as a general indicator of where many climate impacts – on balance – go from destructive to catastrophic.

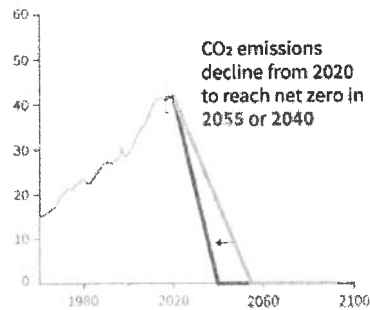
The IPCC projects that going from 1.5 degrees to 2 degrees will make billions of people on earth experience severe heatwaves at higher rates, the seas will rise on average about 4 inches, several hundred million additional people will become more exposed to poverty, the ocean's health will be compromised, and fishing volumes will continue to decline further, amongst other things.

The report also notes that human activities (i.e. mainly burning fossil fuels) have already caused about 1 degree of global warming (see Figure 1 below), and in conjunction with all the greenhouse gases we have already emitted, average temperatures will keep rising.

a) Observed global temperature change and modeled responses to stylized anthropogenic emission and forcing pathways

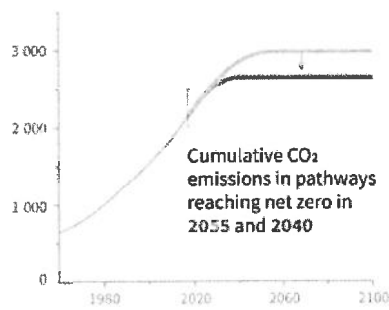


b) Stylized net global CO₂ emission pathways
Billion tonnes CO₂ per year (GtCO₂/yr)



Faster immediate CO₂ emission reductions limit cumulative CO₂ emissions shown in panel (c).

c) Cumulative net CO₂ emissions
Billion tonnes CO₂ (GtCO₂)



Maximum temperature rise is determined by cumulative net CO₂ emissions and net non-CO₂ radiative forcing due to methane, nitrous oxide, aerosols and other anthropogenic forcing agents.

d) Non-CO₂ radiative forcing pathways
Watts per square metre (W/m²)

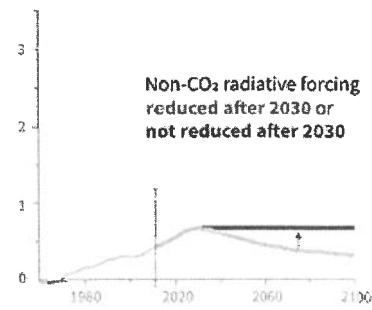


Figure 1. Levels of Cumulative Emissions of CO₂ Determine Ability to Limit Warming to 1.5 Degrees Celsius (2.7 degrees Fahrenheit) – from IPCC Report

Panel a in above figure shows that it is possible to hold the temperature change within the desired limit, but it will take CO₂ emissions to decline at rates shown on **Panel b** (net global CO₂ emissions to reach 0 by 2040 or 2055). As an example, the world's annual carbon dioxide emissions (approximately 40 billion tons per year), would have to be reduced this decade (2020-2030) at a rate higher than 1 billion tons per year (cutting fossil fuel emissions in half by 2030 will be a big part of this effort). Again, by around 2040-2055, the report calls for a total phaseout of the burning of coal.

US Environmental Protection Agency Data - In May 2021, the EPA compiled the latest up-to-date data showing that global warming is making life harder for Americans, and threatens their health, safety, communities and way-of-life. According to the data, heat waves in large US cities has tripled, from two to six each year, and nights are becoming hotter, making it difficult

for plants, animals and people to cool down; the Arctic sea ice cover in 2020 was the second smallest on record.

According to the EPA, the combination of rising temperatures and melting polar ice is causing sea levels to rise on the East Coast and Gulf Coast; in some areas the sea levels rose more than 8 inches from 1960 to 2020, and the number of days when water has inundated communities has increased, and the rate of flooding is accelerating.

County of Riverside - No matter how it is presented, it is a fact that Riverside County has one of the worst air qualities in the nation. In fact, San Bernardino, Riverside and Los Angeles counties rank first, second and third as the nation's smoggiest counties, and have been with the worst smog levels for most of the last 20 years, according to the American Lung Association (ALA) "State of the Air 2021" issued in April 2021.

According to the report, climate change causes increase in wildfires and heat, and are contributing to ongoing air quality challenges, with the transportation sector continuing to be the primary factor. Scientists have been asking state lawmakers to invest \$1 billion in zero-emission vehicle infrastructure, and for stronger zero-emission rules for a wider range of vehicles and trucks. According to the ALA report, "[m]ore than 40% of Americans — more than 135 million people — are living in places with unhealthy levels of ozone or particle pollution," and "[t]he burden of living with unhealthy air is not shared equally. People of color are more than three times more likely to be breathing the most polluted air than (are) white people."

Although there has been some progress in Riverside County as "orange" (unhealthy range) and "high ozone" days have generally dropped, more than 80% of Riverside County residents (including the City of Moreno Valley) continue to live with unhealthy air, especially during the summers, creating risks for the general population and greater challenges for the vulnerable population (those diagnosed with child and adult asthma, chronic pulmonary disorders and cardiovascular disease).

For instance, in the summer of 2018, the South Coast Air Basin (Los Angeles, Orange, Riverside and San Bernardino Counties) "violated federal smog standards for about 87 consecutive days, the longest stretch of bad air in at least 20 years": state monitoring data show. See also Table 1. "The streak is the latest sign that Southern California's battle against smog is faltering after decades of dramatic improvement". The ozone pollution lasted from June-September, and exceeded the federal health standard of 70 parts per billion somewhere across Los Angeles, Orange, Riverside and San Bernardino Counties (we need to keep in mind that inland communities ozone levels are worse than in Los Angeles and Orange, most of the time).

Health experts agree that ozone and other regional air pollutants continue to contribute to asthma and other lung diseases, as well as heart disease, reproductive and developmental issues, and respiratory infections, even below their regulatory limits. The persistence of dirty air throughout the last 20 years has been a troubling sign that demands cities in CA to curb these pollution levels too decrease risk on our population, including the most vulnerable.

Furthermore, air quality experts further agree that even simple activities, such as walking to school or playing outside after school have turned into health threats: "this is a public health threat that's out of their control."

Note: This AQMIS Ozone page reflects the 2015 National 8-Hour Ozone Standard of 0.070 ppm

**South Coast Air Basin
Daily Max 8 Hr Overlapping Avg Ozone - Natl at Highest Site
2018
Parts Per Billion (ppb)**

Day	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec
1	55.0	64.0	48.0	<u>74.0</u>	56.0	<u>73.0</u>	<u>79.0</u>	<u>86.0</u>	<u>91.0</u>	50.0	52.0	42.0
2	48.0	59.0	42.0	57.0	46.0	<u>100.0</u>	<u>88.0</u>	<u>86.0</u>	<u>76.0</u>	41.0	53.0	45.0
3	40.0	69.0	47.0	63.0	61.0	<u>100.0</u>	<u>81.0</u>	<u>87.0</u>	<u>73.0</u>	35.0	70.0	47.0
4	49.0	66.0	48.0	<u>77.0</u>	<u>74.0</u>	<u>91.0</u>	<u>75.0</u>	<u>87.0</u>	<u>82.0</u>	39.0	67.0	47.0
5	45.0	69.0	51.0	<u>76.0</u>	<u>84.0</u>	<u>82.0</u>	<u>96.0</u>	<u>92.0</u>	<u>84.0</u>	50.0	63.0	38.0
6	43.0	54.0	52.0	69.0	<u>85.0</u>	<u>75.0</u>	<u>88.0</u>	<u>111.0</u>	<u>87.0</u>	56.0	59.0	42.0
7	42.0	49.0	48.0	56.0	<u>83.0</u>	<u>87.0</u>	<u>99.0</u>	<u>113.0</u>	<u>92.0</u>	54.0	59.0	38.0
8	34.0	49.0	54.0	62.0	<u>102.0</u>	<u>104.0</u>	<u>78.0</u>	<u>73.0</u>	<u>107.0</u>	53.0	60.0	41.0
9	45.0	57.0	58.0	66.0	<u>104.0</u>	<u>86.0</u>	<u>77.0</u>	<u>88.0</u>	<u>83.0</u>	57.0	53.0	40.0
10	37.0	49.0	33.0	<u>80.0</u>	<u>78.0</u>	<u>84.0</u>	<u>79.0</u>	<u>77.0</u>	<u>81.0</u>	52.0	55.0	35.0
11	39.0	51.0	38.0	62.0	46.0	<u>100.0</u>	<u>74.0</u>	<u>81.0</u>	<u>90.0</u>	51.0	66.0	41.0
12	45.0	45.0	44.0	60.0	51.0	<u>97.0</u>	<u>78.0</u>	<u>71.0</u>	<u>77.0</u>	54.0	46.0	43.0
13	50.0	48.0	37.0	59.0	57.0	<u>80.0</u>	<u>75.0</u>	<u>82.0</u>	<u>74.0</u>	43.0	45.0	45.0
14	52.0	44.0	44.0	<u>74.0</u>	66.0	<u>80.0</u>	<u>86.0</u>	<u>93.0</u>	66.0	53.0	45.0	39.0
15	52.0	50.0	49.0	66.0	68.0	67.0	<u>76.0</u>	<u>91.0</u>	<u>72.0</u>	55.0	40.0	42.0
16	47.0	52.0	45.0	53.0	68.0	54.0	<u>86.0</u>	<u>84.0</u>	68.0	51.0	47.0	49.0
17	51.0	54.0	50.0	58.0	62.0	50.0	<u>104.0</u>	<u>92.0</u>	<u>73.0</u>	53.0	56.0	45.0
18	54.0	56.0	48.0	67.0	57.0	66.0	<u>83.0</u>	<u>89.0</u>	<u>75.0</u>	52.0	62.0	44.0
19	53.0	46.0	53.0	50.0	64.0	<u>98.0</u>	<u>80.0</u>	<u>99.0</u>	<u>80.0</u>	57.0	49.0	42.0
20	45.0	46.0	55.0	61.0	61.0	<u>106.0</u>	<u>84.0</u>	<u>90.0</u>	<u>72.0</u>	60.0	54.0	45.0
21	47.0	49.0	50.0	<u>74.0</u>	46.0	<u>105.0</u>	<u>80.0</u>	<u>81.0</u>	<u>79.0</u>	67.0	56.0	39.0
22	44.0	47.0	37.0	<u>84.0</u>	52.0	<u>125.0</u>	<u>72.0</u>	<u>74.0</u>	<u>88.0</u>	65.0	41.0	48.0
23	47.0	49.0	53.0	<u>76.0</u>	63.0	<u>96.0</u>	<u>106.0</u>	<u>77.0</u>	<u>71.0</u>	64.0	41.0	43.0
24	45.0	49.0	52.0	<u>72.0</u>	61.0	<u>80.0</u>	<u>112.0</u>	<u>80.0</u>	68.0	65.0	40.0	54.0
25	44.0	53.0	53.0	<u>77.0</u>	56.0	<u>94.0</u>	<u>114.0</u>	<u>85.0</u>	<u>75.0</u>	<u>71.0</u>	44.0	42.0
26	46.0	58.0	52.0	<u>74.0</u>	46.0	<u>98.0</u>	<u>101.0</u>	<u>87.0</u>	<u>74.0</u>	<u>71.0</u>	45.0	40.0
27	50.0	46.0	54.0	67.0	61.0	<u>88.0</u>	<u>111.0</u>	<u>81.0</u>	<u>85.0</u>	<u>80.0</u>	47.0	42.0
28	47.0	50.0	56.0	<u>73.0</u>	<u>83.0</u>	<u>85.0</u>	<u>96.0</u>	<u>74.0</u>	<u>73.0</u>	<u>79.0</u>	49.0	44.0
29	44.0		67.0	61.0	<u>82.0</u>	<u>75.0</u>	<u>83.0</u>	<u>72.0</u>	59.0	<u>80.0</u>	42.0	44.0
30	40.0		<u>72.0</u>	50.0	64.0	<u>76.0</u>	<u>92.0</u>	<u>77.0</u>	54.0	60.0	42.0	45.0
31	55.0		<u>73.0</u>		56.0		<u>85.0</u>	<u>96.0</u>		52.0		44.0
MAX:	55.0	69.0	73.0	84.0	104.0	125.0	114.0	113.0	107.0	80.0	70.0	54.0
MIN:	34.0	44.0	33.0	50.0	46.0	50.0	72.0	71.0	54.0	35.0	40.0	35.0

Table 1. The Above Matrix Shows Ozone Levels Exceeding 70 parts per billion Federal Standard in Areas that include Riverside County - from the Air Quality and Meteorological Information System (AQMIS)

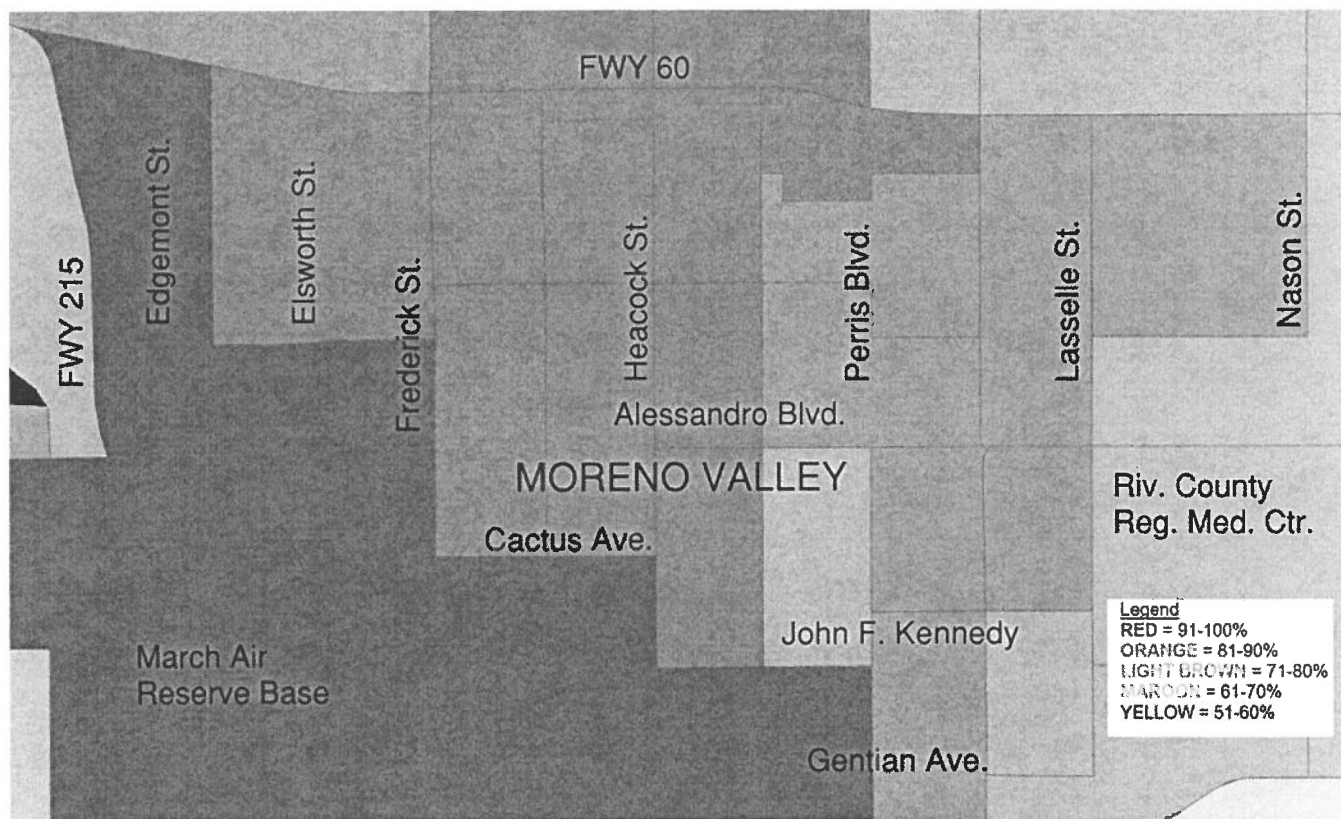


Figure 2. Screenshot of the City of Moreno Valley from the CA EPA CalEnviroScreen tool, as updated in June 2018. High percentages (Red/Orange/Light Brown/Maroon colors) indicate higher pollution burden and vulnerability as compared to other cities in the State.

Moreno Valley - The CA Environmental Protection Agency (EPA), with its CalEnviroScreen tool, evaluates scientifically the various ways many communities in California are burdened by environmental problems and pollution. The CA EPA has determined that the residents of Moreno Valley are already experiencing ozone at rates higher than 97% of the State, and PM2.5 at rates higher than 92% of the State. Diesel particulate matter are experienced at rates higher than 33-80% of the State, depending as to whether you are on the west side and/or close to the freeways, were the rates are already high (close to 50-80%).

Based on the above scientific determinations by the AQMIS and the CA Environmental Protection Agency of ozone, PM2.5 and diesel particulate matter levels of burden, it is clearly shown that Moreno Valley residents are already being exposed to air contaminants that contribute to asthma, lung cancer, high blood pressure and cardiovascular disease (heart attacks and strokes).

President Biden GHG and Climate Change Proposals – In April 2021, the White House committed to:

- Reducing GHG emissions 50-52% below 2005 levels by 2030,
- Power the nation with 100% renewable energy (carbon free energy sources) by 2035,
- Funding 500,000 vehicle-charging stations by 2030,

- Creating well-paid union jobs to mitigate Climate Change by making infrastructure more resilient, improving air and water quality, and innovating in American technology.
- Integrate all levels of government (municipal, county and state) and community leaders (religious, cultural, health) to confront together the existential threat of Climate Change.

These are tall commitments that need to be taken into consideration as plans are laid out for the future of the City of Moreno Valley.

California Efforts on Climate Change – California, consistent with its leadership in addressing world and human challenges, has recognized the threat of climate change and has taken action for several decades now.

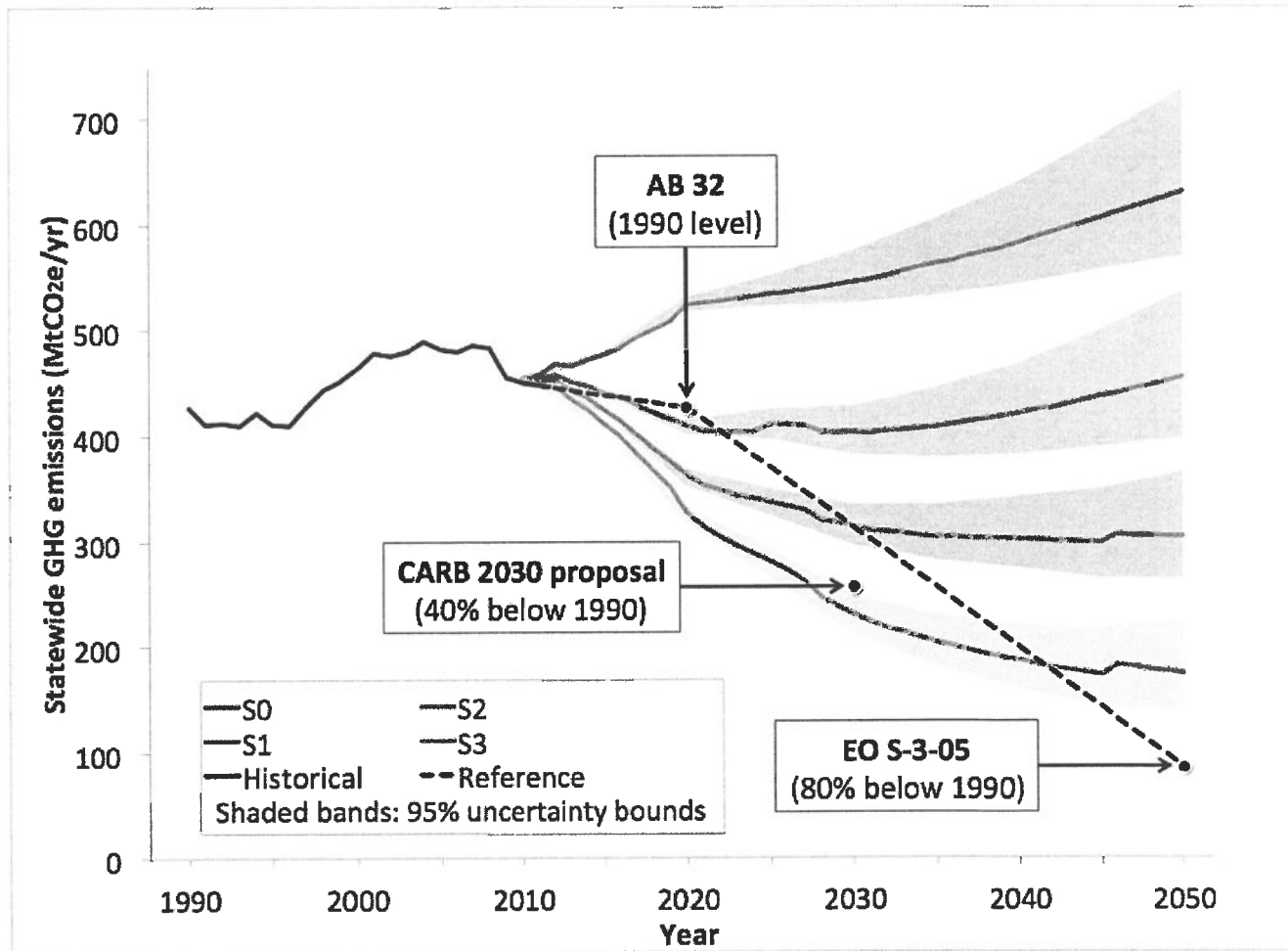


Figure 3. Legislation and Policy Steps Taken by the State of California to Mitigate GHG Emissions

To reduce the potentially catastrophic effects of climate change, California has recognized the science and understands that we must dramatically reduce our annual statewide GHG emissions, and has taken steps to accomplish this objective.

- Assembly Bill (AB) 32 requires CA to reduce its total statewide GHG emissions to 1990 levels by 2020.
- Senate Bill (SB) 32 requires CA to reduce its total statewide GHG emissions 40% below 1990 levels by 2030.
- Further, the Governor's Executive Order (EO) S-3-5 directs state agencies to reduce statewide GHG emissions to 80% below 1990 levels by 2050.

To achieve these ambitious but necessary goals, the State of California will have to reduce GHG emissions from various sectors of the economy.

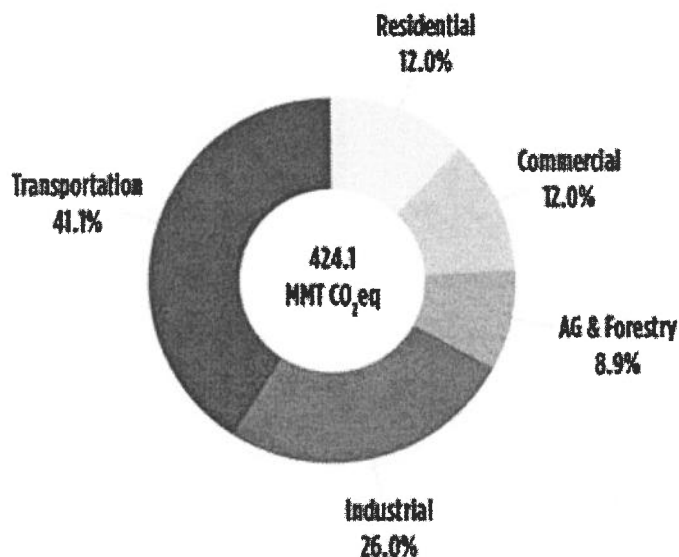


Figure 4. California GHG Emissions by Sector (Percentage of Carbon Dioxide Equivalent) – from the California Energy Commission Using Data from the California Air Resources Board

As shown on above figure, the Transportation and Industrial (including electricity generation) sectors are the top contributors to the State's total GHG emissions.

In April 2021, the California Governor Newsom used his gubernatorial power to order no new state fracking permits to be issued starting 2024. He also ordered the California Air Resources Board (CARB) to plan for the phase out of oil extraction no later than 2045, which is consistent with former Governor Brown's 2018 order requiring the California Air Resources Board (CARB) to reach carbon neutrality by 2045 (requiring any remaining emissions be offset by equivalent net removals of carbon dioxide (CO₂) from the atmosphere, including through sequestration in forests, soils and other natural landscapes).

In May 2021, the South Coast Air Quality Management District (SCAQMD) approved the Warehouse Indirect Source Rule (PR 2305) which requires warehouses, and indirectly diesel-fueled trucks serving them, to cut chronic air pollution linked to asthma, cancer and deaths in Los Angeles, Orange, Riverside and San Bernardino counties. If the district does not comply with federal standards, costs will be greater than those associated with the rule. The rule will

phase-in mainly between 2022-2024, and will impact warehouses greater than 100,000 square feet. The rule sets up a system where warehouses can choose from: acquiring zero-emissions or near-zero-emissions trucks, installing charging infrastructure, solar panels, and/or filter systems in schools, hospitals, community centers, and other locations. Warehouses could also pay a mitigation fee to fund air quality improvements in communities affected.

The district report on the rule confirms what we already know, diesel exhaust from trucks aggravates allergies and lead to breathing and heart problems, and cancer. The report further confirms that neighborhoods close to warehouses already face substantially higher burdens than other neighborhoods, including higher rates of asthma and heart attack, and most such affected communities have higher poverty rates, with Hispanics and African Americans being the majority in population.

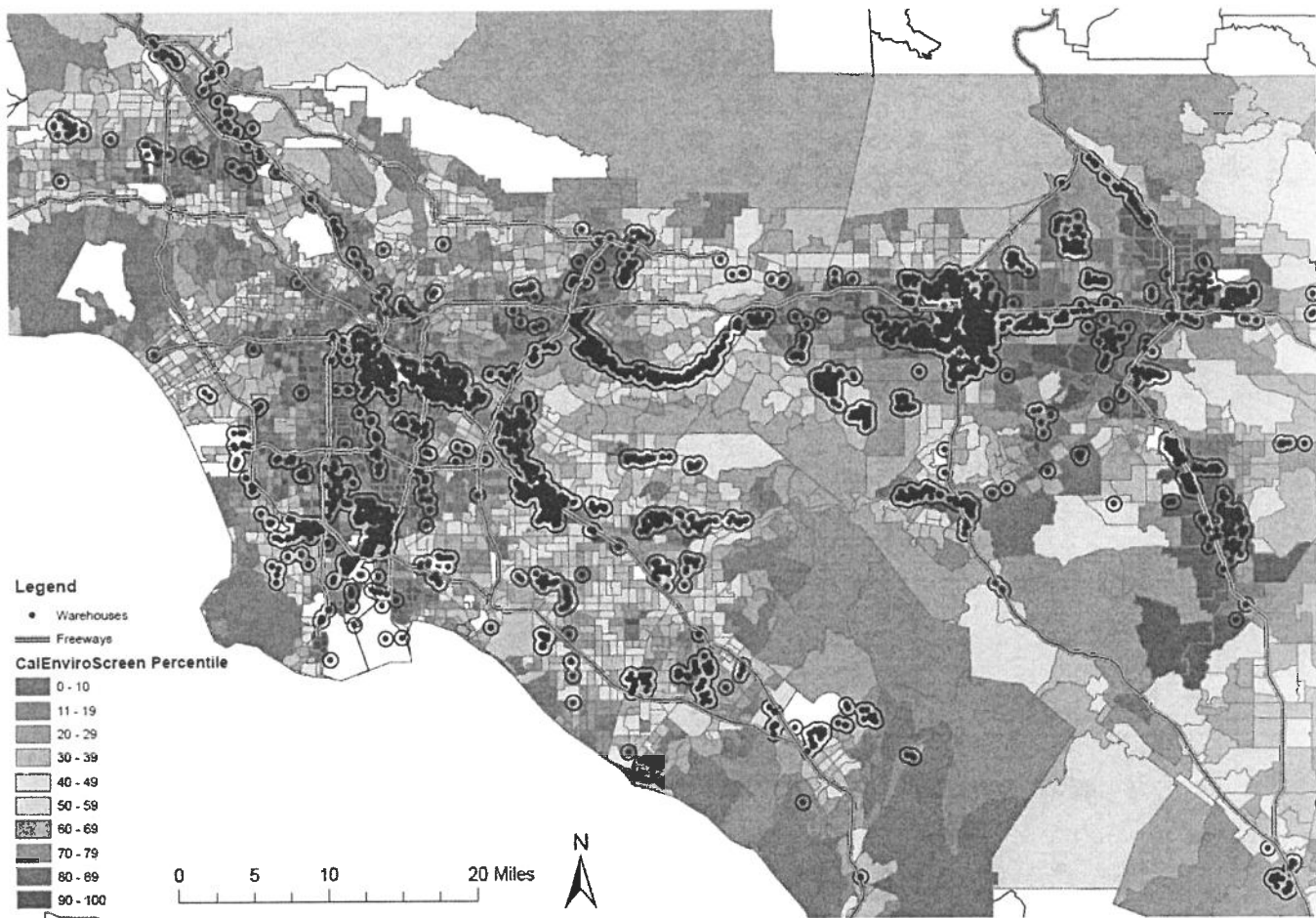


Figure 5. Current Environmental Burden on Communities near PR 2305 Applicable Warehouses as Demonstrated by CalEnviroScreen’s Percentile 80th Analysis

Above figure shows that South Coast AQMD communities (including Moreno Valley) currently living close to (greater than 100,000 square feet) warehouses rank within the 80th percentile (**orange/red**) of pollution. The ranking process es based on pollution burden, the higher the score (out of 100%) means they experience a higher burden. This again confirms that Moreno

Valley and many other communities are already experiencing the highest localized pollution burdens.

During the public comments for the South Coast AQMD meeting, a member of the public stated: *"It does not matter what the economic benefits are if no one's around to spend it"*.

II. MODIFICATIONS ARE NECESSARY TO THE MORENO VALLEY CLIMATE ACTION PLAN TO BE CONSISTENT WITH FEDERAL AND STATE COMMITMENTS AND PROJECTIONS TO MITIGATE THE EXISTENTIAL THREAT OF CLIMATE CHANGE

As noted above, President Biden has committed to lower the country's GHG emissions by 50-52% below 2005 levels by 2030, and the State of CA intends to lower the State's emissions by 40% below 1990 levels and by 2030, and 80% below 1990 levels by 2050 (Figure 3), along with a current (and previous) Governor's overarching goal to reach carbon neutrality in the State by 2045.

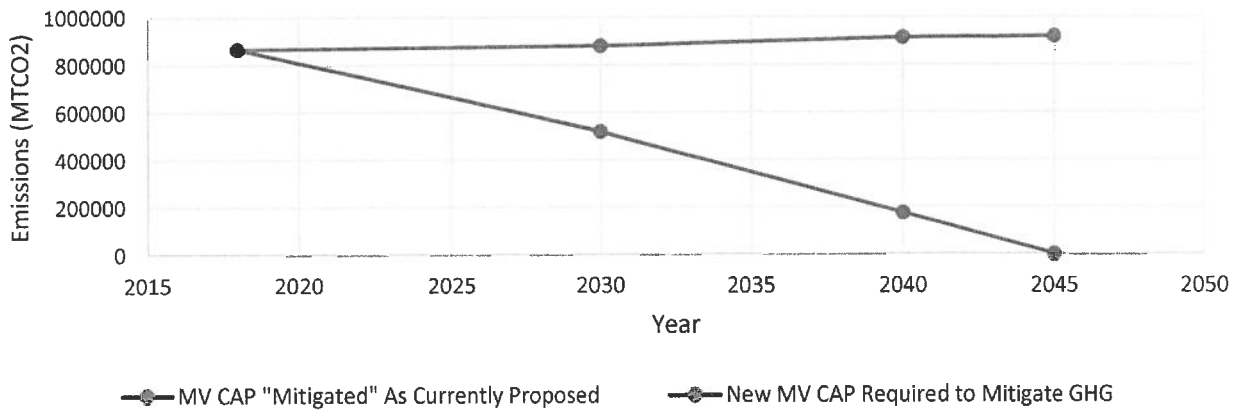
All municipalities and counties in the State are part of these national and state GHG mitigation efforts, and by properly decreasing cumulative GHG impacts of existing and proposed projects, there will come to fruition real, measurable improvements to the health and quality of life in CA, and the City of Moreno Valley inhabitants in particular.

A. Modifications Required to the Current Proposed MV CAP: The City of Moreno Valley has the authority and ethical imperative of requiring any proposed project to mitigate its emissions on a downward trajectory throughout the life of the project, and reaching net-zero emissions at a time certain to protect the well-being and quality of life of the Moreno Valley residents. By taking this bold and necessary action, the City leaders will protect the environment and well-being of the people in Moreno Valley, and will implement emission mitigation approaches consistent with those requested from the United Nations Intergovernmental Panel on Climate Change, and federal and state governments.

The MV CAP "Mitigated" as Currently Proposed has the following emission baseline and trajectory estimates: Baseline 100% (866, 410 units) in 2018, and 105.4% (913, 365 units) by 2040 (an actual increase of about 5.4% in total emissions). Trajectory was extended to year 2045 to compare with the new MV CAP. (See Figure 6 below).

A new MV CAP to Mitigate GHG needs to be developed that is generally consistent with the downward GHG trajectory as proposed by federal and state commitments, with an overarching goal of carbon neutral by 2045: Baseline 100% (866, 410 units) in 2018, 40% below 2018 (519,846 units) by 2030, 52% below 2018 (415, 876 units) by 2040, and 100 below 2018 by 2045. (See Figure 6 below for comparisons).

Figure 6. Moreno Valley Climate Action Plans Emissions



Each and every project that is submitted to the City needs to be reviewed and required to mitigate GHG emissions with a downward trajectory as determined with the new MV CAP Required to Mitigate GHG (new MV CAP), so that additional cumulative GHG effects do not continue to contribute to the already existent respiratory ailments, cardiovascular disease, and early death of the residents of the City, and that have had a disproportionate impacts on vulnerable populations such as children, the poor, the elderly, individuals with existing health conditions, and communities of color.

This transition will not only be implemented to protect the health and well-being of all the residents and the surrounding environment of the City, but jobs will be created in the areas of energy efficiency, renewable energy, electric vehicles and its charging infrastructure, electrification of homes that change from natural gas to electricity, and their components, and other advanced technological solutions that may be developed in the future and that are consistent with or better than the state's goals. Training of workers in the fossil and related industries needs to get started now, to be part of this transformation in a timely manner.

B. Important Matters to be Addressed by Future Projects: Key questions that need to be addressed by new projects in the area of Moreno Valley are as follows:

- How will the mobile and stationary emission sources being proposed will impact the State's and Moreno Valley GHG targets (e.g. Baseline 100% in 2018, 40% below 2018 by 2030, 52% below 2018 by 2040, and 100% below 2018 by 2045)?
- How will the mobile and stationary emission sources being proposed will impact the already unhealthy air found in the area of MV, the current and future MV residents - including those already most vulnerable (young and adult asthmatic, and adults with chronic respiratory illnesses)?
- How will the project impact environmental surroundings, including parks, protected areas, and protected species? Does the project need to seek approval of any plans

developed to protect plants and species from appropriate state and federal regulatory agencies?

C. Use of Offsets and/or Carbon Credits Should be Limited and as a Last Resort (less than 5% of required GHG mitigation by project): Every project proposal that mitigates GHG emissions by using offsets and/or carbon credits should limit its use to no more than 5% or less, as these offsets do not necessarily benefit the area of Moreno Valley directly.

It is important to recall that “CARB recommends that lead agencies prioritize on-site design features that reduce emissions, especially from [vehicle miles traveled], and direct investments in GHG reductions within the project’s region that contribute potential air quality, health and economic co-benefits locally”. Therefore, every project must be required to first fully consider and implement direct reductions before it purchases offsets and/or carbon credits.

D. GHG Mitigation Methods and Investments, and Jobs Created: Every project needs to consider and include the following mitigation approaches being pursued by federal and state governments, as the most effective ways to fight climate change at the national, state and local levels:

- Energy efficiency,
- Decarbonization and electrification of mobile and stationary sources (e.g. acquiring zero-emissions or near-zero-emissions trucks and installing charging infrastructure; changing homes and buildings from natural gas to electricity),
- Smart City growth,
- Renewable energy (e.g. extensive use of solar panels, biofuels, other renewable resources),
- Hydrogen derived from renewable energy,
- Installing filter systems in schools, hospitals, community centers, and other locations, and
- Other advanced technological solutions that may be developed in the future and that are consistent with or better than the state's goals.

As noted above, these methods and investments should be required to be on-site improvements with appropriate monitoring mechanisms, while offsets and carbon credits should be used as a minimum and last resort (and <5% of total use).

Figure 5 below shows how these different methods and investments are projected and recommended by the State to be used by all municipalities and counties to effectively mitigate their GHG footprint. It also shows the resolve of the State to decrease emissions to very low levels by the decade 2040-2050, generally consistent with the United Nations Intergovernmental Panel on Climate Change (Figure 1).

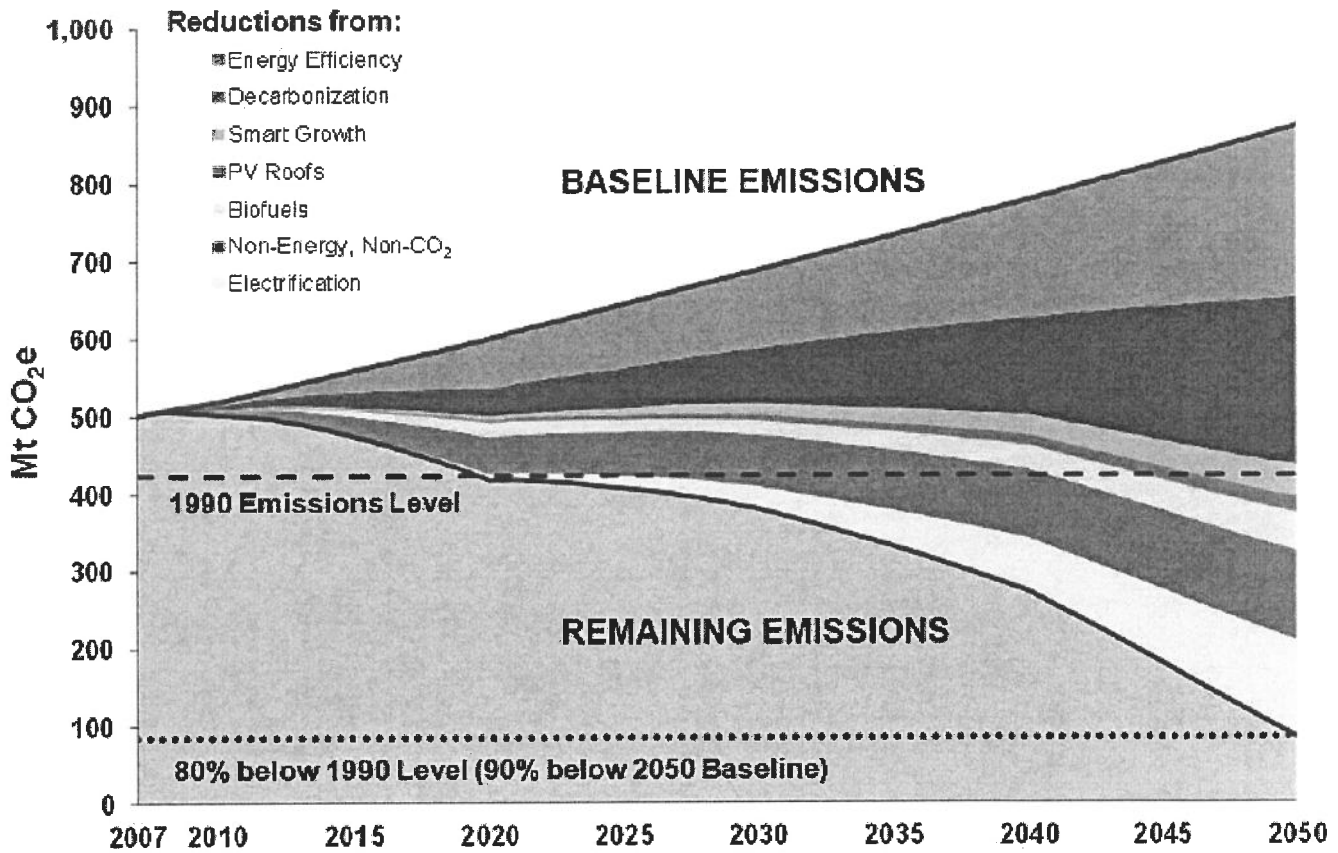


Figure 5. State of California Recommended Methods and Investments to Decrease a City GHG footprint.

Also, as noted above, these methods and investments will bring jobs to the City of Moreno Valley, and the training of workers in the fossil industry and related areas needs to get started now, to timely effect this transformation.

E. Projects Modeling and Monitoring: These targets will be as good as they are enforced. Any proposed project with a GHG footprint will need to be modeled as accurate as possible to determine its impact to the goals stated by City policy. Developers should be required to make necessary corrections/improvements to their plans to keep the City within the GHG emission levels and goals.

Further, the City leaders should provide updates to the public on an annual basis on how it is doing to reach its GHG goals, and actions taken for any corrections.

III. THE MORENO VALLEY UTILITY INTEGRATED RESOURCE PLAN AND CLEAN ENERGY GOALS NEED TO BE COORDINATED WITH THE MODIFIED MV CAP, AND FEDERAL AND STATE COMMITMENTS AND PROJECTIONS

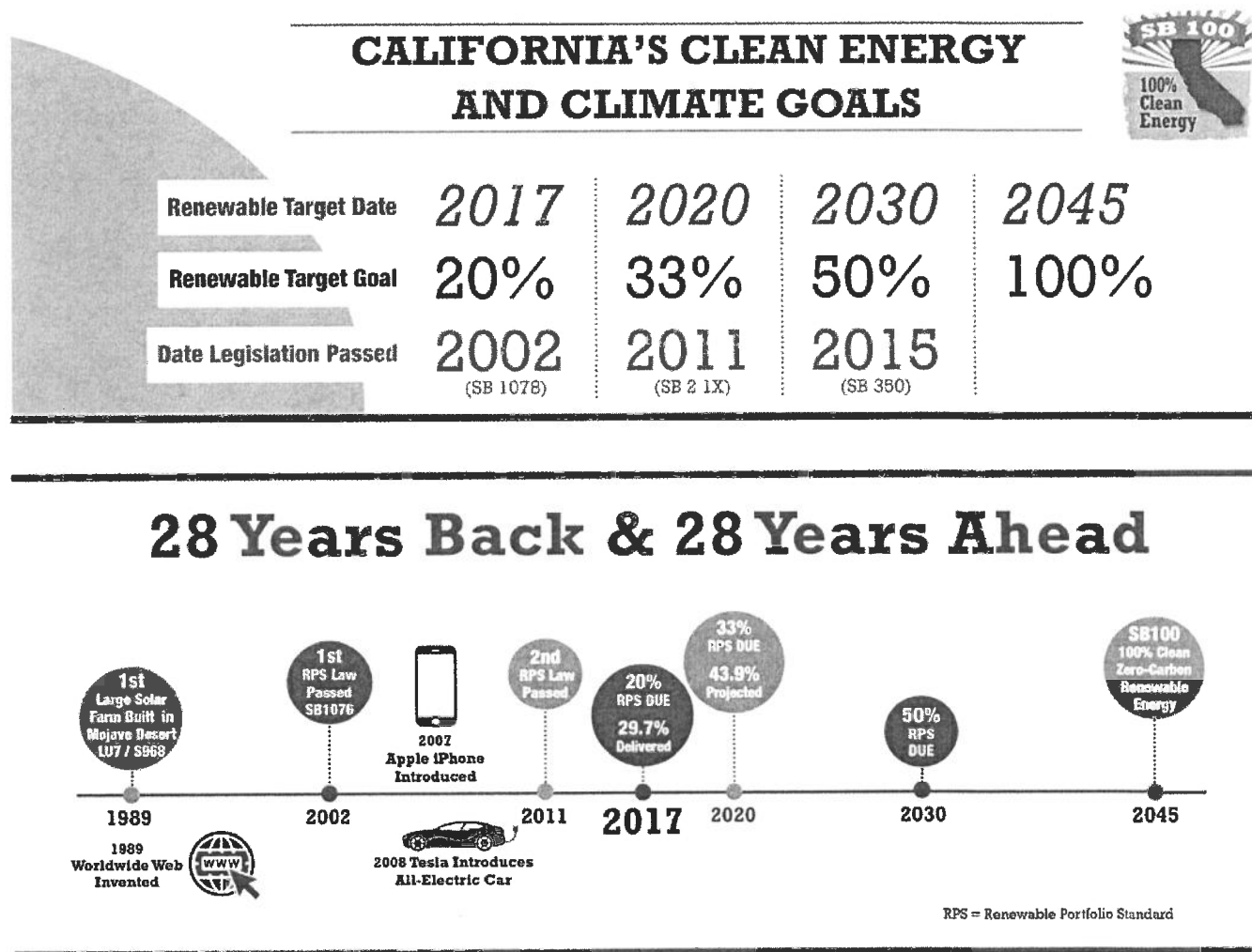


Figure 6. California’s Clean Energy Goals – Past and Future

Ensuring access to affordable, reliable, sustainable and state-of-the-art energy for all is a key goal for an enhanced quality of life and well-being of the Moreno Valley residents. Further, the MV Utility will play a key role in mitigating GHG emissions by using renewable energy to power the City.

Figure 6 above shows the State of California’s goals to achieve 50% renewable resources by 2030 (SB 350) and 100% by 2045 (SB100). Furthermore, as noted above, President Biden has committed the nation to reach 100% of renewable energy (carbon free energy sources) by 2035.

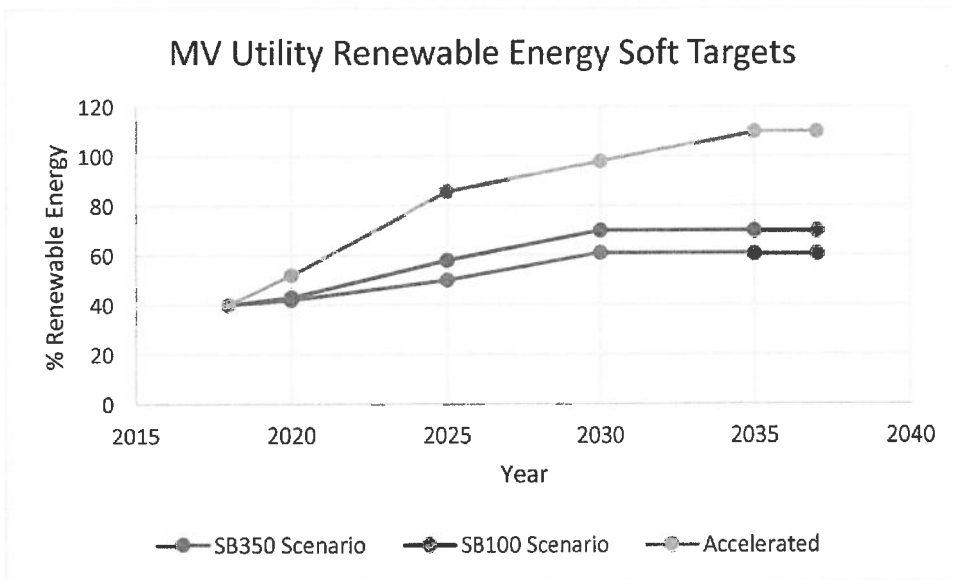


Figure 7. MV Utility Renewable Energy “Soft” Targets (with Procurement Margin) to Reach 100% for Various Scenarios

As the State and cities are moving towards becoming carbon neutral in the future, the Moreno Valley Utility (MVU) is working towards 100% clean energy under various scenarios, as shown on the 2018 Integrated Resource Plan (IRP) (Figure 7 above). The MVU 2018 IRP clearly shows the possibility of the City to reach 100% of renewable energy by 2030, using an accelerated scenario.

As the Moreno Valley Utility updates its IRP to achieve its 100% renewable energy goal, it will be important that it considers the transitional characteristics that the demand will be undergoing through the next 20 years, which will include by 2040 (cases with different assumptions will have to be modelled as sensitivities):

- Extensive use of solar panels for residential, commercial and industrial use, within the confines of system reliability,
- Potential use of utility solar/wind energy and storage,
- Increased use of interruptible load,
- Higher than 50% of passenger cars on the road within the City are plug-in electric by 2040,
- Higher than 50% of residents have access to residential charging, and 40% access to workplace charging to encourage more daytime charging by 2040,
- Appliances and heating equipment within existing and new buildings that switch from natural gas to electric,
- Reduce energy consumption by 15% compared to 2020 by 2030, and by 30% compared to 2020 by 2040,
- Assume other potential advanced technology solutions that may be available within the study horizon that assist in reaching the MVU clean energy goals.

As suggested above, the City needs to start investigating the feasibility of building its own energy resource(s), based on solar, wind, batteries and other advanced clean technology, to energize the City 100% by 2030, or earlier. Any excess energy could be sold to the market for City revenue, and to pay for these investments. The current prices and state of technology make this investigation appropriate and highly feasible at this time.

Monitoring the advancement of technology and costs on an annual basis to accelerate above goals will be very important.

Clearly, electrification (decarbonization) of vehicles, industry and buildings (which are the top contributors to the State's total GHG emissions - see Figure 4), and the use of renewable energy and other advanced technology consistent with the city's clean energy goals will bring extensive improvements in air quality and health across all areas in the city, both to disadvantaged and non-disadvantaged. Furthermore, as the City transitions to a 100% renewable energy, many jobs could be created as described in Sections II and V.

IV. ENVIRONMENTAL JUSTICE AND PROJECT APPROVAL PROCESS ISSUE CONCERNS

As we know it, environmental justice covers fairness in the distribution of environmental benefits and burdens, it also entails the ability of people to be involved in the decision-making process around projects that will impact them, and a recognition of the role of historical events that have placed certain sectors of our society in marginalized status.

Before the current pandemic, the City had already been experiencing high rates of statewide poverty and unemployment, and inability to reach home ownership due to out-of-reach Real Estate prices. Furthermore, the socioeconomic situation of the poor residents in Moreno Valley affects their ability to deal with the pollution burden they already experience.

Environmental justice requires that a modified MV CAP be implemented to mitigate GHG emissions, with trajectories consistent with the President commitment and the overarching policies of the State of CA. By taking this bold and necessary action, the City leaders will provide relief to neighborhoods already suffering from substantially higher burdens of pollution, communities that generally have higher poverty rates, and with Hispanics and African Americans as residents.

Concurrently, governmental regulations require that jurisdictions "with disadvantaged communities" identify policies that reduce the "compounded health risks" and that include (amongst other things) "reduction of pollution exposure, including the improvement of air quality ...". Thus, every project that is to be approved by the City needs to be provided to all residents with the following

1. With full information and sufficient time for review. There have been instances when a project is modified, with not enough time given to perform a fair review, with no explanations on what the changes were and the reasons for the changes, and to top it all, creating additional inconsistencies and illegal issues as related to previous versions of the project.

2. With GHG mitigating measures that are local, measurable, verifiable, and real, with the impact of improving the quality of life and well-being of all.
3. The City should provide responses to all comments provided; comments may be aggregated if similar.
4. When a project is several hundreds of pages or more, the residents should be given briefing documents (20 pages or less) that summarizes the project, explains changes that have occurred since last update, and how previous comments provided were handled. These documents should be printed in English and Spanish (according to the US Census Bureau, 58% of residents are Hispanic) and any other language that the City deems appropriate, and City staff must be available by phone or in person to answer questions in Spanish.

Not addressing these matters is inconsistent with the vision and core values of the City, which envision our City to: fully promote democracy and invite citizen involvement on matters that may impact their way of life, be a safekeeper of a healthy and self-sustaining environment, and protect the health and well-being of current and future generations. Doing otherwise would be making a mockery of our democratic process.

V. JOBS CREATION

A. As we move forward to fight Climate Change and become part of the extraordinary change in working environment that is taking place now and for years to come, it will be important for the City to balance and emphasize the jobs of the future that mainly fall in the categories of healthcare, robotics, medical equipment, electric vehicles and renewable energy and components, logistics, energy efficiency, electrification of homes that change from natural gas to electricity, semiconductor industry, and other advanced technological solutions that may be developed in the future.

This diversification, along with being well-paid jobs, will bring a strong revenue stream to the City, and support an optimum quality of life for residents. Focusing on a few jobs that may only automate the activities of individuals will make life difficult for such workers, and decimate the future of the City.

It is also time now to start preparing the Moreno Valley workforce for this transition.

B. Continue to promote hiring locally. This is a great program that brings benefits directly to the City. Furthermore, the new Moreno Valley Business & Employment Center (BERC) is a good hub for businesses, local employers, and residents to connect for jobs and opportunities.

C. Years ago there used to be annual AYSO regional soccer tournaments (this is just one example) in Moreno Valley that would bring people and business to the City's restaurants and hotels for a weekend or two. It would also bring people awareness of the City and its services and beauty. Why are we not doing more of this, for this and other sports and cultural events?

D. The City needs to bring businesses that contribute to the residents' health and well-being. I still need to go to Riverside to find a good, and fully stocked health food store (we have been without one for several years now), and also for a health food supermarket. Additionally,

services that focus solely on self-improvement and health (e.g. yoga, meditation, etc.) are sorely needed and need to be encouraged to come.

VI. TREES, TREES, TREES

Trees provide environmental benefits that directly improve human health and our quality of life. Trees clean GHG and lung-damaging chemicals while cooling the City, by:

- * Absorbing gas pollutants (e.g. O₃, nitrogen oxides [NO_x], and sulfur dioxide [SO₂])
- * Capturing particulate matter on their surfaces (e.g. dust, ash, pollen, and smoke)
- * Freshening the air we breathe by releasing oxygen as a byproduct of photosynthesis
- * Transpiring water and shading building surfaces and street pavement, which lowers local air temperatures, thus reducing ozone levels.
- * Cooling urban heat islands they can reduce ozone formation.
- * Directly sequestering CO₂ as woody and foliar biomass as they grow.
- * Reducing the demand for heating and air conditioning units, thereby reducing emissions from electric power generation.

Trees also:

- Increase property values,
- Slow water runoff and prevent soil erosion,
- Help buffer noise pollution and cool our homes, streets, and cities
- Can save you money on energy costs, and
- Just simply, they are beautiful.

These benefits obviously depend on tree species, size, health, and location. Due to these proven benefits, the General Plan needs to include the following action items:

- A three-year project should be started now to plant trees along Perris Blvd, Heacock St. Sunnymead Blvd, Cottonwood Ave., Allesandro Blvd., Cactus Ave. John F. Kennedy Dr., and other projects should be planned for other streets once this is completed.
- Offsetting GHG can be substantially increased by ensuring that tree planting, care, and preservation are part of the General Plan, and should be fully supported and financed.
- Parking lot tree planting should also be part of the City strategy to improve current air quality. For example, there should be a parking lot ordinance specifying a certain amount of planted area per space, and without allowing clustering in islands.

Trees are an effective and beautiful way to fight our existential threat: Global Warming.

VII. BUILD CITIES FOR PEOPLE, NOT CARS

Bicycles will be one of the keys to fight Climate Change and Air Quality issues in the future, and thus, able to provide a healthier lifestyle. If the City of Moreno Valley makes it easier for people to walk, bike and take the bus, fewer GHG and lung-damaging chemicals will be emitted by oil-burning transportation.

Frankly, sometimes it is scary to bike due to the behavior of car and truck drivers, they blow their horns onto you, tail you or pass you very closely without caring ... it is a risk every time one bikes, it does not have to be this way.

The City needs to at least triple existing bike lanes within the next 5 years (and at the end start a new cycle of construction for a new area), and provide riders with truly protected curb-level bike lanes to the greatest extent possible, like in Copenhagen; further, it is important the City educates the public that bicycle riders should be respected and provided the right of way when in doubt.

It is but logical that if Moreno Valley had a good and strong network of protected bike lanes, more people would use them.

VIII. SENIORS

According to State projections in 2017, by 2030 around 9 million Californians will be over the age of 65, around 3 million more than there are today (6 million). Within a decade, more than 20% of the state's residents will be seniors. While California's working-age population is projected to grow by about 6% by the mid-2030s, California's 65-plus population will grow by more than 65%.

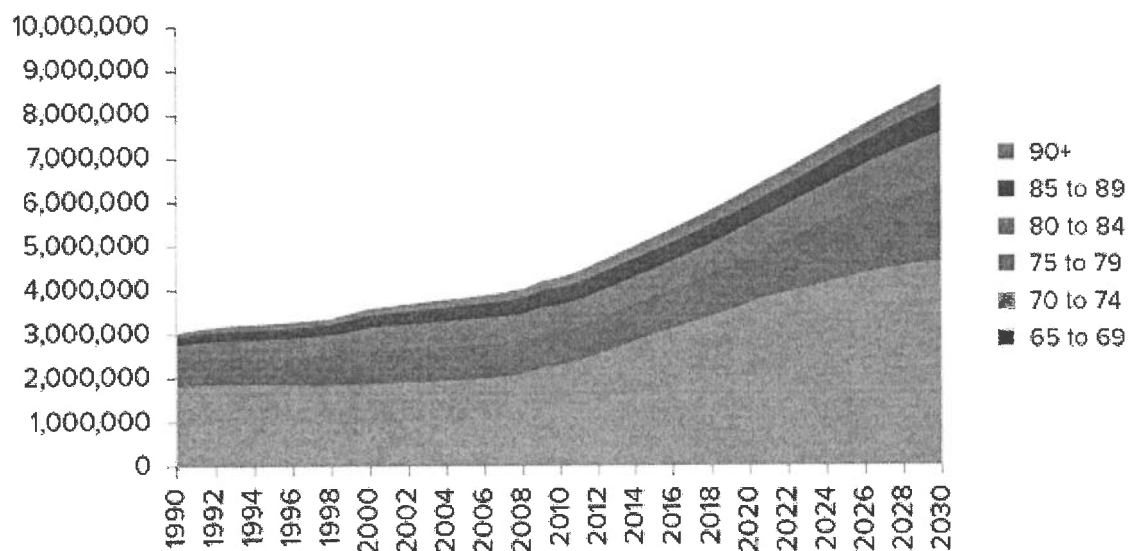


Figure 7. California's Growth Projections (and Past) for People over 65 of Age

The figure above shows how approximately the different senior-age ranges have grown through the years, and how they are expected to grow by 2030.

The over-65 population will become much more racially and ethnically diverse, with the fastest growing population being the Hispanic population (2017-2030): approximately 106% growth.

Finally, the current State senior population could possibly double in the next two decades, and will also become more racially and ethnically diverse, signaling a growing need for culturally competent services, and a significant impact on senior support services provided by the City.

The General Plan needs to include and pursue the following actions:

1. The City should start pursuing plans for budgeting to construct a new Senior Center to accommodate the projected increase of senior population in the State, as Moreno Valley will certainly be impacted. Note that this projection only mentions population over 65, and our Senior center provides services for people over 50, and disabled individuals. This new Senior Center should be constructed within the next five years, with current and future bilingual personnel, and with room to grow to accommodate for the next decade, as senior population may increase by 50%, as noted above.
2. The City needs to continue working closely with the State to receive the needed additional resources to meet the demand that will be required from this increase in senior service requirements.
3. The City needs to support incoming health-related businesses in the area, including nursing care facilities and health care professionals, as may be needed in the future.
4. The City leaders should work closely with county, state and federal officials to facilitate at the Senior Center programs that directly assist older people feelings of depression and loneliness.

IX. CITY SHOULD PLAY A STRONGER ROLE IN HELPING WITH THE HEALTH AND FUTURE OF LOW-INCOME CHILDREN, AND RETHINK LIBRARY USE TO HELP MORE WITH OVERALL EDUCATION OF CHILDREN

Impact of Poverty on Children – Within the last 15 years, researchers have found correlational proof that poverty affects children via their brains, including the areas of language and impulse control (surface area of brain's outer layer is smaller) and learning and memory (hippocampus volume is smaller). According to this latest research, these differences are not inborn or inherited traits, but rather due to the circumstances in which children grew up in.

As poverty brings malnutrition, higher stress levels, and lower-quality education, researchers have found that these aspects of living directly influence children's cognitive development, via their brains.

Additional research confirms that the emotional health and development of young children begins early in life, and in fact, prolonged emotional distress (such as found in poverty and/or troubled homes) may impact the child's well-being later in life, including the child's ability to avoid addictions, have good social and work relationships with others, and be a contributing member of the community.

Some cities have been conducting pilot programs to help single mothers with newborns and young children living in poverty with a monthly stipend for a few years, and monitoring whether this aid helps in the healthy development of their children, by comparing with others not receiving the help. Results have been encouraging.

Based on the above scientific facts and the potential for helping underprivileged children, the City should initiate a pilot project to help single mothers with young children with a monthly stipend (\$100-300 for 5 years), and expand the project if it is successful.

Improving Educational Approach and the Role of Libraries– Research has found that there is a correlation between lower quality education and lower brain and cognitive development.

As we are recovering from the pandemic, we need to reformulate how we are using our libraries. They should be a place with tools that create in all children passion, curiosity, imagination, and persistence while learning through hands-on exercises and outside trips. Technology now allows libraries to have project-based learning with exercises that will expand the ability of children and young minds to collaborate with each other, learn critical thinking skills, and understand each other cultural differences and commonality, abilities that are required for survival 21st century.

Therefore, the City should create spaces and tools in our libraries where kids can perform these activities, with the assistance of staff, or in coordination with local schools. Libraries can also offer workshops and short area trips for all children in Moreno Valley so they can learn about nature, the environment, climate, science and urban development.

Through hands-on projects and field trips, libraries can complement education of children and young people to allow them to take ownership of a sustainable way of life, and to develop themselves into contributing members of society.

X. HOUSING CRISIS AND SOLUTIONS FOR YOUNG FAMILIES

The City needs to take stronger steps to provide more assistance for young families to obtain a home. The current situation and prices do not allow young people to establish this American dream, and to shelter their families for life:

- A. Information and Workshops - Provide booklets (and other information) and conduct workshops to inform first-time buyers with young families of available assistance and programs that may allow them to obtain a home (e.g. County of Riverside Economic Development Agency, Home Buyers Clubs, others).
- B. Establish Policies that Lower Costs of Housing – The City should establish policies and support existing and new local laws that require developers to build a higher percentage of affordable housing devoted to first-time buyers with young families.
- C. Be Creative – The City needs to be creative and use state and federal government aid to establish funding and loan programs to assist new families on this extreme crisis, and keep informing them on an-ongoing basis.

XI. COMMUNITY CHARACTER - INCREASE AWARENESS AND PRIDE OF THE CITY BY CREATING HARMONY AND UNITY AROUND IT

There are various inexpensive ways to create initiatives to improve the relationship of the Moreno Valley residents and the City, and its image. The General Plan needs to include the following actions:

1. Establish City websites that give the following information to residents and visitors:
 - a. "Best things to do in Moreno Valley this week" (Events),
 - b. "Best places to go in MV as voted by its citizens" (food, cultural sites, trails, etc.).
 - c. This information should be updated on an annual basis.
2. Place a marker at the entrance of all MV trails, with a placard describing the name of the trail, any historical significance to the area/City, and flora and fauna that may be found in the area.
3. Establish a historical website where different buildings/locations of the City are depicted and with a click of a building, you get the picture and a brief historical description of the place (e.g. where the former raceway in MV was, where original indigenous people lived). There should also be a physical placard on any location that may have the historical significance to the City.
4. A mobile City Hall, where services are provided to the residents. "You do not need to come to City Hall – City Hall comes to you". The key will be to make sure residents get a definite benefit out of it (e.g. reporting city maintenance issues, crime, homelessness, information on how to get permits and even getting those permits on the spot, etc.).
5. The Mayor and all City Council members should provide the citizens with an opportunity to meet, "for coffee", "at the park" or wherever. These meetings are extremely useful and make residents feel part of the City, and enable them to resolve their issues without having to go to City Hall. A sense of belonging!
6. In addition, with all the digital platforms that are used to provide information to residents, it is very important that the City also uses low-tech technology (banners, big letter announcements) on the streets, fences and public places (libraries, City Hall, Senior Center, etc.). People (20-40 years old) are generally too busy to handle all information on technology, but they drive around and are able to see signs on the road; further, people over 50 generally have the time to go to public places. Previous events and information that would have been benefited from this low-tech approach:
 - a) First Moreno Valley Film Festival (I was the only one who attended, along with the organizers at the Harkins theater some years ago – it was a fabulous experience!);
 - b) This General Plan Update – very few people know about it;
 - c) Moreno Valley Utility – this is a great utility, winner of several prizes and with a great management team; very few people know about it; we need to "blow our horn" in newspapers and other platforms more frequently on this one!

This approach is currently used in several cities and works effectively: Los Angeles (museums banners on the streets), Palm Springs (foreign film festival banners across streets), etc. It is successfully used here in MV for high GPA students.

XII. GOALS AND ACTIONS – CREATING RESPONSIBILITY AND ACCOUNTABILITY

Every goal and action stated in the General Plan, Housing Element, EIR and Climate Action Plan needs to have a:

- Clear and short description of the item,
- Department/Group responsible,
- Measurable action, and
- Due date.

This will assign responsibility, accountability, transparency, and clarity of goal and action. Updates should be provided to the public at least every two years to gauge progress, and to correct direction as may be necessary.

Chris Ormsby

From: Susan Zeitz <whitwdtravel@verizon.net>
Sent: Tuesday, May 25, 2021 12:39 PM
To: Chris Ormsby; David Marquez
Subject: GPU Question

Warning: External Email – Watch for Email Red Flags!

May 25, 2021

On page 27 In the general plan draft presented for approval I found this:

"In addition, a General Plan Advisory Committee (GPAC) was formed to serve in an advisory role— advising and informing City staff, consultants, Planning Commission, and City Council—and **met regularly throughout the course of the project to help define community input into a shared vision, brainstorm issues and ideas, and review the policy content of the General Plan to ensure that it met the needs and desires of the community.** Other community members also attended the GPAC meetings and provided input. Further, City Council and Planning Commission meetings were held throughout the General Plan Update process. The ideas and feedback gathered through the community outreach process deeply informed and are embedded within this General Plan"

So where are the meeting dates on line?

I did request the content, dates... from the city clerk but have been told they have 10 days to get the information to me.

I can find the planning and council meeting information on line so want to know why I can't find this info?

Susan Zeitz

26386 Ironwood Ave.

Moreno Valley, Ca. 92555