

Appendix M-2

UXR Responses to Comments - Noise

June 13, 2023

SUBJECT: WEST CAMPUS UPPER PLATEAU NOISE IMPACT ANALYSIS RESPONSE TO COMMENTS

Urban Crossroads, Inc. is pleased to submit this Response to Comments on the noise impact analysis for the West Campus Upper Plateau (“Project”), which is located on either side of Barton Street and Cactus Avenue in the jurisdiction of the March Joint Powers Authority (March JPA) and unincorporated Riverside County. This letter has been prepared in response to the comments on the January 3, 2023, *West Campus Upper Plateau Noise and Vibration Analysis (Noise Study)* prepared by Urban Crossroads, Inc.

LETTER A-9, COMMENT 22A

The comment suggests that the site configurations, including loading dock locations, cannot reasonably be known at this level of analysis, and as such, potential noise impacts on surrounding sensitive receptors cannot be reliably estimated or evaluated. The Noise Study evaluates the operational noise source activities associated with full buildout of the Project. The operational noise source locations presented on Exhibit 9-A of the Noise Study includes over 300 individual noise sources to conservatively describe the potential worst-case noise environment. This includes a combination of noise sources such as loading dock activity, roof-top air conditioning, trash enclosure activity, parking lot vehicle movements, truck movements and park activities. While the actual location and configuration of the loading docks cannot be reasonably known at this level of analysis, the operational noise analysis includes one or more loading docks within each industrial, business park and mixed-use parcel. In addition, each loading dock area included in the analysis is evaluated using a sound power level of 111.5 dBA L_w , representing a combination of trucks idling, reefer activity (refrigerator truck/cold storage), deliveries, backup alarms, etc.

To reduce the noise exposure to the noise sensitive residential areas near the Project site, several design features were considered throughout the site planning process. These design features include positioning the loading dock areas in the center of the site and maintaining conservation easements to maximize the distance between noise source activities and the adjacent noise sensitive residential areas. In addition, the operational noise analysis includes a planned 12-foot-high noise barrier/screenwall surrounding the loading dock areas. Consistent with the Specific Plan requirements, the loading dock locations evaluated in the noise analysis were situated to be oriented away from noise sensitive land uses or screened with the planned 12-foot-high noise barrier/screenwall as shown on Exhibit 9-A. The location of potential loading dock areas were developed to conservatively estimate the potential noise source activities associated with the loading docks.

LETTER A-9, COMMENT 22B

The comments suggest that the noise analysis did not consider the potential warehousing within the mixed-use areas, *which should reasonably be expected to include potential loading dock areas*. A review of the Noise Study operational analysis (see Exhibit 9-A) shows that the Business Park and Mixed-Use land use areas INCLUDE loading activity as a potential noise source. Figure 4.11-9 will be updated to

reflect Exhibit 9-A of the Noise Study.

LETTER I-166, COMMENT 7

The commenter suggests that 55 dBA noise level for the Park may be underestimated. As the Draft EIR explains, the noise analysis used the reference noise levels to represent the Specific Plan operations and calculate the operational source noise levels, including park activities, that are expected to be generated at the Specific Plan area and the Specific Plan-related noise level increases that would be experienced at the sensitive receiver locations. As explained on page 4.11-44 of Section 4.11, Noise, of the Draft EIR, the reference noise levels collected at an existing park are expected to reflect the noise level of activities within the open space-recreation land use areas of the Project site, since the reference noise level measurement includes youth soccer games, coaches shouting instructions, playground activities, and parents cheering, clapping, and speaking on cell phones. The reference noise levels include the park activities identified by the commenter. As further explained in the Draft EIR, and shown in Table 9-1 in the Noise Study, a reference sound power level of 81.1 dBA L_w representing a sound pressure level of 49.4 dBA L_{eq} at 50 feet to describe the potential impacts from the Park. The reference noise levels are used to assess the project related noise levels at the nearest noise sensitive receiver locations and demonstrate compliance with the 55 dBA L_{eq} exterior noise standards.

In addition, it is important to recognize that the Park noise source activities are limited to the daytime hours of 7:00 a.m. to 10:00 p.m. As indicated on Table 4.11-25 of the Draft EIR, and on Table 9-3 of the Noise Study, the daytime noise levels associated with Project park activities at the nearest noise sensitive receiver locations R8, R9 and R10 are estimated to range from 20.8 to 27.6 dBA L_{eq} . Park noise source levels are far less than the 55 dBA L_{eq} daytime exterior noise level standards and are well below the existing daytime ambient noise levels presented on Table 5-1. The existing ambient noise levels west of the Project site that are represented by noise level measurement location L8 indicate that the existing daytime noise level is 47.3 dBA L_{eq} . Since the existing ambient noise levels west of the Park (47.3 dBA L_{eq}) are far higher than the potential noise levels from the Park (27.6 dBA L_{eq}), the Park will not generate a measurable increase in the existing ambient noise level at the nearest noise sensitive receiver locations west of the Project site. As indicated on Table 4.11-28 of the Draft EIR, and on Table 9-6 of the Noise Study, the combined ambient and Project noise levels at the nearest noise sensitive receiver locations R8, R9 and R10 are estimated to range from 47.8 to 50.0 dBA L_{eq} , with the noise increase attributed to the Project ranging from 0.3 to 1.4 dBA L_{eq} .

The commenter expresses concern with the location of the park and recommends relocating the park to the eastside of the Project site. However, as explained in the Draft EIR, the operational noise levels associated with the Project, including park activities, would not exceed the daytime and nighttime exterior noise level standards, and operational noise impacts would be less than significant at the nearby noise-sensitive receiver locations. Therefore, no mitigation is required.

LETTER I-788, COMMENT 14

The comment suggests that noise associated with idling semi-trucks has not been accounted for. However, as explained in Section 4.11, Noise, of the Draft EIR, and in Section 9.2.2 of the Noise Study, the Project’s noise analysis specifically includes truck idling. As the Draft EIR explains, the noise analysis used the reference noise levels to represent the Specific Plan operations and calculate the operational source noise levels, including loading dock activity and truck movements, that are expected to be generated at the Specific Plan area and the Specific Plan-related noise level increases that would be experienced at the sensitive receiver locations.

As explained in the Draft EIR, the reference loading dock activities are intended to describe the typical outdoor operational noise activities associated with the Specific Plan, and noise source levels from the loading dock activity includes truck idling, reefer activity (refrigerator truck/cold storage), deliveries, backup alarms, trailer docking including a combination of tractor trailer semi-trucks, two-axle delivery trucks, and background operation activities. The reference noise level measurement represents multiple concurrent noise sources, including trucks with their engines idling based on actual observed activities. However, the primary source noise activity is related to the docking activities, backup alarms and refrigerator units, not extended truck idling. As explained in the Draft EIR, the operational noise levels associated with the Project, including loading dock activity and truck movements, would not exceed the daytime and nighttime exterior noise level standards, and operational noise impacts would be less than significant at the nearby noise-sensitive receiver locations.

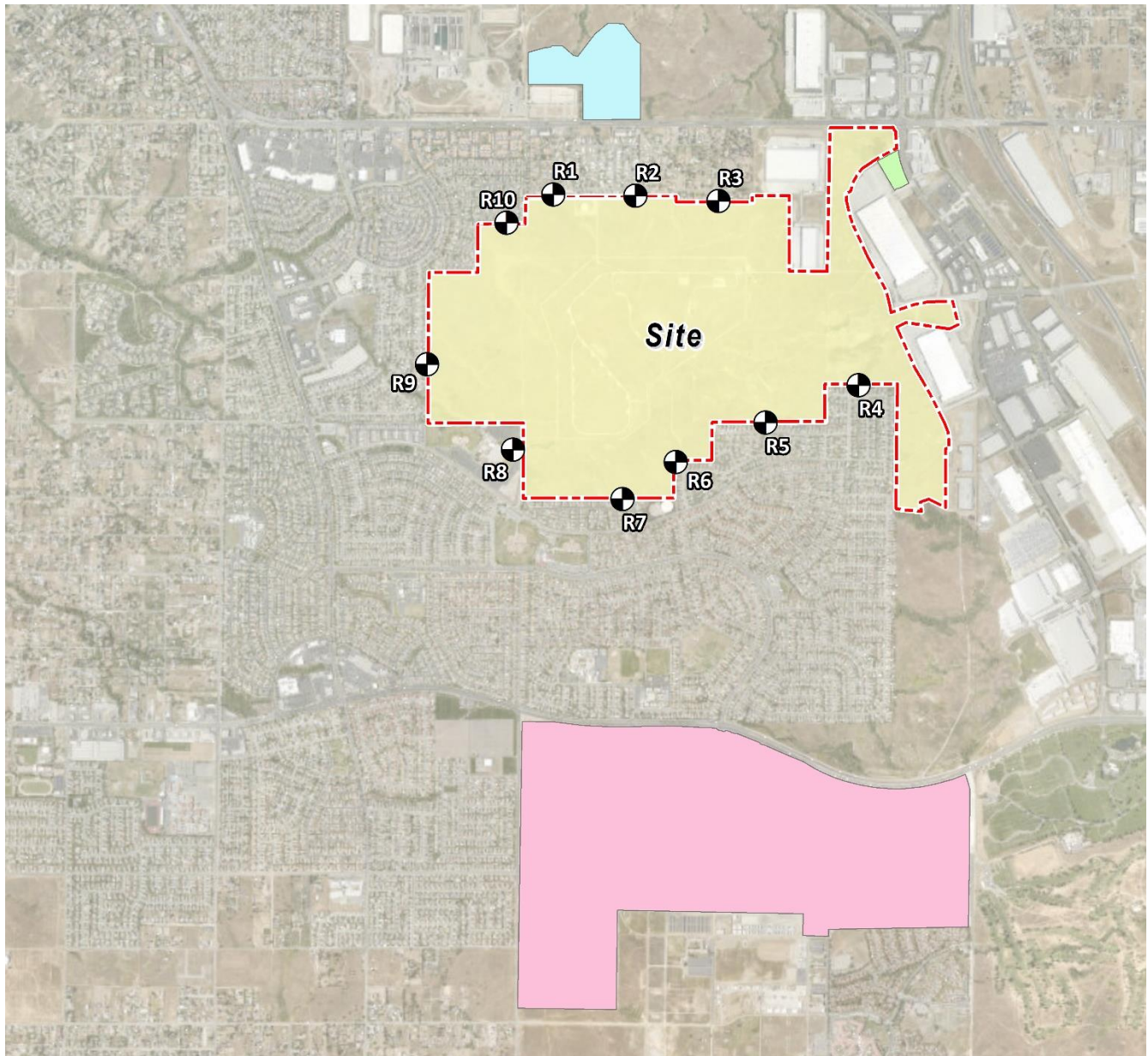
LETTER I-832, COMMENT 7

Figure 4.11-9 will be updated to reflect Exhibit 9-A of the Noise Study.

LETTER I-834, COMMENT 6

The commenter requests cumulative construction analysis of other “under construction projects” including Sycamore Hills Distribution Center, Meridian South Campus Buildings F, G, and 1, and Meridian West Building 4 as shown below on Exhibit A. Since noise levels diminish quickly at a rate of 6 dB for each doubling of distance from a source, the potential cumulative construction noise source activities are expected to be lower than the Project related construction noise levels. This is largely due to distance, topography, intervening building structures and development between the nearest noise sensitive receiver locations and the potential “under construction projects”. Using the same reference construction equipment noise levels published by the Federal Highway Administration (FHWA) in the Roadway Construction Noise Model (RCNM), in combination with the same FTA guidance for noise assessment used in the Project Noise and Vibration Analysis, we calculated the potential construction noise levels for each of the “under construction projects.” The construction noise levels from the Sycamore Hills Distribution Center are expected to range from 32.5 to 46.2 dBA Leq at the Project noise sensitive receiver locations without accounting for any intervening building structures or topography. The cumulative construction noise levels from the Meridian South Campus are estimated at 24.8 to 34.8 dBA Leq, and 30.2 to 42.5 dBA Leq from Meridian West Building 4. With the Project related construction noise levels ranging from 33.7 to 48.0 dBA Leq, the cumulative construction noise levels are not expected to meaningfully contribute to a potential cumulative construction noise increase

Exhibit A: Cumulative Project Locations



LEGEND:

-  Site Boundary
-  Meridian South Campus
-  Meridian West Building 4
-  Sycamore Hills Distribution Center

In addition, the existing ambient noise levels ranging from 47.3 to 61.5 dBA Leq show that noise from intervening roadways, specifically Alessandro Boulevard for the Sycamore Hills Distribution Center and Van Buren Boulevard for the Meridian South Campus development, will likely overshadow the potential cumulative construction noise source levels from these external projects.

June 13, 2023

Page 5 of 5

Therefore, the proximity of the West Campus Upper Plateau project site to the nearest noise sensitive receiver locations suggests that any potential cumulative construction noise levels will be diminished below ambient levels and washed out by intervening roadway traffic noise.

Respectfully submitted,

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Principal



