

Appendix N-3

UXR Responses to Comments - Transportation

DATE: July 10, 2023
TO: Nicole N. Cobleigh, Dudek
FROM: Charlene So and Alex So, Urban Crossroads
JOB NO: 14064-01 RTC

WEST CAMPUS UPPER PLATEAU RESPONSE TO COMMENTS

Urban Crossroads, Inc. is pleased to submit the following Response to Comments on the Draft Environmental Impact Report for the West Campus Upper Plateau (Project), which is generally located south of Alessandro Boulevard and west of Brown Avenue within the jurisdiction of the March Joint Powers Authority (MJPA) in Riverside County.

CITY OF MORENO VALLEY LETTER A-4

COMMENT A-4.2

Prior to improvement plan approval, Street Improvement Plans shall include the segment of Cactus Avenue between the northbound freeway 1-215 freeway onramp and the southbound 1-215 freeway onramp including the ramp intersections for a grind and overlay and forwarded to Caltrans for review and approval. If required by Caltrans, all dry and wet utilities shall be shown on the plans and any crossings shall be potholed to determine actual location and elevation. Any conflicts shall be identified and addressed on the plans. The developer is responsible to coordinate with all affected utility companies and bear all costs of any utility adjustments.

The developer is required to perform a 2-inch grind and overlay along Cactus Avenue between the 1-215 freeway ramps. An encroachment permit from Caltrans will be required for all work within Caltrans right-of-way.

RESPONSE A-4.2

In April 2023, the California Department of Transportation (Caltrans) completed the grind and overlay for Cactus Avenue, between the I-215 northbound and southbound ramps, inclusive of restriping the overpass. As the requested work has been completed, there are no changes or revisions to the West Campus Upper Plateau Traffic Analysis (2022 Traffic Analysis) required.

RIVERSIDE COUNTY TRANSPORTATION AND LAND MANAGEMENT AGENCY LETTER A-7

COMMENT A-7.1

Will there project provide any physical improvements to restrict trucks from accessing Alessandro Blvd. and travel west? If yes, can you provide a copy of the conditions of approval that will requires its implementation?

RESPONSE A-7.1

The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. The parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway. See Figure A-7.1-1, below.

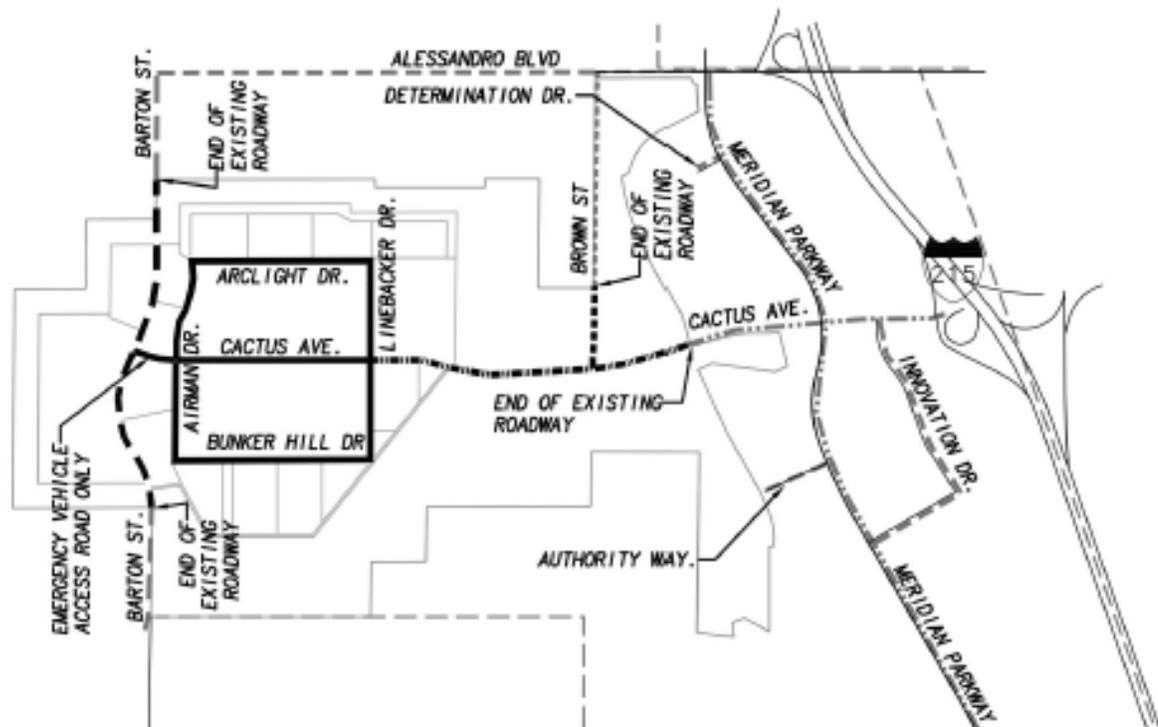


Figure A-7.1-1 Proposed Project Circulation Plan

Currently, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. See Figure A-7.1-2, below.



Figure A-7.1-2 Brown Street looking north towards Alessandro Blvd.

Section 1.6.1 of the 2022 Traffic Analysis identifies on-site and site adjacent roadway improvements that will be constructed to accommodate site access. In response to this comment regarding the eastbound approach to the intersection of Brown Street and Cactus Avenue, Recommendation 3 was revised as follows:

Brown St. & Cactus Av. (#21)- The following improvements are necessary to accommodate site access:

- Project to install a traffic signal.
- Project to construct the southbound approach with a shared left-right turn lane.
- Project to construct the eastbound approach with a left turn lane (two-way-left turn lane) channelized or otherwise signed to prevent trucks from turning left onto Brown Street and two through lanes.
- Project to construct the westbound approach with a through lane and shared through-right turn lane.

There are no anticipated traffic hazards or other traffic impacts due to the implementation of channelization or signage preventing trucks traveling east on Cactus Avenue from turning left onto Brown Street. Additionally, Exhibit 1-6 of the 2022 Traffic Analysis (Appendix N) and Draft EIR Figure 3-6, Proposed Truck Routes, was revised to show no left turn from Cactus Avenue onto Brown Street. No additional revisions to the 2022 Traffic Analysis are required.

COMMENT A-7.2

How are these funds utilized to conduct enforcement? Is Riverside PD, Sheriff, and CHP involved with the enforcement of truck routes? What will occur after the two-year period?

RESPONSE A-7.2

The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Under PDF-TRA-1, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. As the EIR explains on p. 4.13-2 March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week and truck enforcement paid through an existing truck route mitigation fund. Additionally, as the EIR explains on p. 4.15-22, to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of \$100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval.

COMMENT A-7.3

The March JPA General Plan designates Brown Street (Plummer Street) as a 4-lane Major Arterial. The text in the DEIR indicates the ultimate section for Brown Street is a 2-lane Industrial Collector? Will the reduction in travel lanes be sufficient to accommodate the traffic at buildout of the sufficient to accommodate the traffic at buildout of the March JPA General Plan? Is there a General Plan Amendment associated with the change in roadway classification?

RESPONSE A-7.3

Exhibit 2-1, Transportation Plan, of the March JPA General Plan currently designates Brown Street as a Major Arterial and shows Brown Street/Plummer Street as a through road between Alessandro Boulevard to the north and Van Buren Boulevard to the south. As described on p. 3-21 of the EIR, in 2014, the March JPA placed approximately 141 acres located north of Van Buren Boulevard under a conservation easement currently managed by the Rivers and Lands Conservancy. The Project proposes to place 445.43 acres surrounding the Specific Plan Area under a similar conservation easement. As such, Brown Street could not be extended south of Cactus Avenue without impacting, and likely violating, the existing and proposed conservation easements. As described on p. 3-22 of the EIR, the Project's requested entitlements include amending Exhibit 2-1, Transportation Plan, of the March JPA General Plan to identify the Project's proposed revisions to the March JPA circulation network, including revisions to the roadway designations.

In the configuration proposed by the Project, Brown Street will serve already existing development to the west and abut the Conservation Easement to the east. Aside from the Specific Plan Area, there is no further undeveloped/unentitled land within March JPA jurisdiction that would impact Brown Street capacity.

The pass-by volumes have been corrected in the traffic study to include the correct pass-by ADT volumes. As such, the ADT volumes have been updated for the following study area roadway segments for all With Project scenarios:

- Cactus Avenue, from Airman Drive to Linebacker Drive (#6)
- Cactus Avenue, from Linebacker Drive to Brown Street (#7)
- Brown Street, Alessandro Boulevard to Cactus Avenue (#12)

Based on the updated ADT volumes at these segments, the following study area roadway segment was found to operate at an acceptable LOS (LOS D or better) under all analysis scenarios:

- Brown Street, Alessandro Boulevard to Cactus Avenue (#12)

The following roadway segments are still anticipated to operate at an unacceptable LOS for the With Project scenarios:

- Cactus Avenue, from Airman Drive to Linebacker Drive (#6)
- Cactus Avenue, from Linebacker Drive to Brown Street (#7)

However, it should be noted that although at full buildout of the Project, anticipated daily volumes on the Cactus Avenue segment exceed the defined roadway segment capacity (based on the March JPA General Plan), the results of the more detailed peak hour intersection operations analysis show that all intersections on either side of the Cactus Avenue segment operate at an acceptable LOS of D or better at full Project buildout.

The more detailed peak hour intersection operations analysis explicitly accounts for factors that affect roadway capacity and was utilized to determine if roadway segment widening is actually necessary. If the intersection operations for the intersections on either side of the roadway segment are anticipated to operate at an acceptable LOS during the peak hours, roadway segment widening is typically not recommended. The intersections are considered “choke points” along the roadways and if the intersection operations analysis is anticipated to operate at acceptable levels, then it is anticipated that the intersections can process the traffic volumes along the roadway segment without the need for additional roadway segment widening. Additionally, roadway segment analysis is considered a planning level analysis whereas the intersection operations analysis is considered more design level analysis.

Based on a review on long-range (Horizon Year) traffic conditions analysis at full build out of the Project, the intersections on either side of Cactus Avenue, from Airman Drive to Brown Street, are anticipated to operate at acceptable LOS during the peak hours. As such, no additional improvements have been identified to the roadway segments identified above (#6 and #7).

CITY OF RIVERSIDE LETTER A-9

COMMENT A-9.4

- *Section 1.10: Traffic Calming-Barton Street*
 - *The project should be conditioned to construct the speed feedback signs, speed limit signs, advisory speed signs, curb ahead warning signs and associated striping along Barton Street. Locations and quantities to be determined.*
- *Section 1.6.1: Site Adjacent and Site Access-Recommendation #5 Barton Street*
 - *We request that adequate on-street parking be provided adjacent to the trail. If on-street parking is prohibited, then is there an off-street parking facility available? Where are trail users supposed to park?*
 - *Please evaluate adding a parking lane next to the multi-purpose trail segment and adding "No Parking" signs for the rest of the roadway segment.*
- *Table 1-4: Summary of Improvements and Rough Order of Magnitude Costs*
 - *If striping plans are not provided prior to acceptance of the traffic study, can a condition of approval be added to the project to provide the striping plan? (Striping plans are to show feasibility of all the improvements)*
- *Section 3.5: Truck Routes*
 - *The project should be conditioned to work with the City to finalize appropriate improvements and mitigation measures to ensure that project truck traffic adheres to adopted truck routes.*

RESPONSE A-9.4

- As noted, the 2022 Traffic Analysis identifies a number of potential traffic calming measures for Barton Street in Section 1.10. The identified traffic calming measures within the 2022 Traffic Analysis are feasible to implement and selection of specific traffic calming measures will not affect the findings of the 2022 Traffic Analysis. Additionally, there are no anticipated traffic hazards or other traffic impacts due to the implementation of traffic calming measures. As explained on page 4.15-22 of the DEIR. "MM-TRA-2 would require the Project applicant to develop and implement a Barton Street Traffic Safety Plan with appropriate traffic calming measures such as raised crosswalks/sidewalk extensions, raised intersections, chicane, center line and curb adjustment, roundabouts and lane narrowing supplemented with speed activated speed limit signs/warning signs, additional signage, flashing beacons, approved by the March JPA Civil Engineer, in compliance with a three-party memorandum of understanding mitigation executed by the City of Riverside, March JPA, and Meridian Park LLC. "
- Although no on-street parking will be provided along Barton Street, the Project will be constructing off-street parking for the park and areas adjacent to the trail heads (see Figures 2-4 and 2-5 of the West Campus Upper Plateau Specific Plan for conceptual designs). This will allow users to drive, park, and access the parks/trails. Since on-street parking is not evaluated in the 2022 Traffic Analysis, there are no changes to the findings

and there are no anticipated traffic hazards or other traffic impacts based on the off-street parking provided. MM-TRA-2 will be revised to restrict on-street parking along Barton Street through the use of no parking signs.

- Comment noted on the request to include a condition for providing striping plans for improvements and working with the City of Riverside to implement improvements. Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. Therefore, no mitigation measures are required.
- Comment noted on the request to include a condition to work with the City of Riverside to ensure that Project truck traffic adheres to adopted truck routes.

COMMENT A-9.25

P696 - The DEIR states that "Additionally, direct access to retail uses would be via internal roadways of Airman Drive, Arclight Drive, Linebacker Drive and Bunker Hill. There would be no direct access to retail uses from Barton Street." In order to provide opportunities for community-service retail uses to be established within the Mixed Use areas of the SPA, City Staff recommend that vehicular access to Mixed Use-zoned parcels fronting on Barton Street be permitted for non-industrial uses only; should the proposed Specific Plan be revised to permit vehicular access as such, this statement and the corresponding analysis in this Section of the DEIR should be revised accordingly.

RESPONSE A-9.25

The restriction of mixed-use access directly onto Barton Street was at the request of local residents at a Community Meeting in order to limit the potential cut-through traffic into the existing residential neighborhoods to the south on Barton Street. As such, the last revision of the 2022 Traffic Analysis reallocated all passenger car traffic (including mixed use traffic) onto Cactus Avenue to the east of Barton Avenue, with no direct connection of Cactus Avenue to Barton Street. If the mixed-use areas consider direct access onto Barton Street as part of future submittals, then changes to the access assumptions and potential operational effects of those changes will be assessed in a future supplemental traffic study.

COMMENT A-9.26

Thresholds of Significance – VMT Impact Thresholds – The DEIR states in this section that "The proposed Project would be considered a mix of retail, office, business park, medical, , research and development, and services." This statement 1) does not identify the land use categorization rubric used to establish the constituent land uses within the project and 2) appears to have omitted significant components of the proposed land use program, i.e., high-cube fulfillment and cold storage warehouse, for example. The DEIR should clarify whether, and, if so, under which category, the multiple millions of square feet of warehousing and logistics-related land uses proposed were categorized for the purpose of determining appropriate significance thresholds for the Project's VMT impacts.

RESPONSE A-9.26

As explained in the West Campus Upper Plateau Vehicle Miles Traveled (VMT) Analysis dated October 11, 2022 (2022 VMT Analysis). Table 1 of the 2022 VMT Analysis disclosed the number of employees per land use type, industrial (inclusive of warehousing), business park and retail that were input into RIVCOM. The 2,340 non-retail employees include industrial employees who would drive to and from the warehouse buildings. Therefore, the VMT per non-retail employee presented in the 2022 VMT Analysis applies to all of the warehouse buildings in the Specific Plan Area. This same methodology was used in the Draft EIR and the 2022 VMT Analysis. It should be noted, the City of Moreno traffic engineer concurs with the results of the 2022 VMT Analysis. (March 18, 2022 comment letter).

COMMENT A-9.27

The DEIR states in this section describes physical improvements (e.g., "channelization") that would prevent large vehicles such as trucks from making specified turning movements onto roadways within and surrounding the project area. The DEIR further concludes that "the above-mentioned improvements would enhance public transit, roadway, bicycle, or pedestrian facilities. The Project would not include any improvements that would interfere with the construction of pedestrian or bicycle facilities in the future. Therefore, no impacts to alternative transportation facilities would occur, and no mitigation measures are required." This conclusion does not address potential future bus or other mass transit service that may be established within the SPA in the future to serve user accessing the proposed SPA. This conclusion should be reevaluated to address the potential for bus service on roadways within the SPA in the future and address whether there are potential impacts to future transit service that are not sufficiently addressed in the DEIR.

RESPONSE A-9.27

The Project site is currently served by the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. Existing transit routes in the vicinity of the study area are illustrated on Exhibit 3-16. As shown, the existing RTA Route 20 provides to service from Alessandro Boulevard to the Moreno Valley March Field Metrolink Station. RTA Route 27 also runs along Orange Terrace Parkway and Van Buren Boulevard to the south of the Project. There is an existing bus stop on Alessandro Boulevard near Brown Street. RTA submitted a comment letter on the Project (A-3) indicating they do not have comments at this time and noting the inclusion of sidewalks along the Project's main roads, which will provide safe pathways for pedestrians to connect to public transportation. The channelization and/or signage preventing trucks traveling east on Cactus Avenue from turning left onto Brown Street would not interfere with future bus or other mass transit service. Buses or other mass transit service would be able to access the Campus Development via Brown Street and return to existing routes along Alessandro Boulevard via Cactus Avenue and Meridian Parkway.

COMMENT A-9.45

We have reviewed the Transportation Section of the Draft Environmental Impact Report (DEIR) and we have the following comments:

1. *The Public works Traffic Division would like to request a meeting to discuss the traffic signal warrant analysis and the improvements.*
2. *The Traffic Division would like to request an opportunity to review the Construction Management Plan.*
3. *Please provide information on timeline/phasing program of improvements.*
4. *Please provide information and co-ordinate with RTA on any proposed bus-stop amenities for the Barton Street.*
5. *Section 1.10 – Traffic calming measure: The project should be conditioned to construct the speed feedback signs, speed limit signs, advisory speed signs, curb ahead warning signs and associated striping along Barton Street. Locations and quantities to be determined.*
6. *Section 3.5, Truck route: The section includes that “No trucks access is permitted along Barton Street. The Project Applicant and the City should work together on an appropriate mitigation measure to ensure Project traffic adheres to the routes as shown on the Project (Truck) trip distribution.” – The project should be conditioned to work with the City of Riverside to finalize appropriate improvements to ensure that project truck traffic adheres to the adopted truck routes.*

RESPONSE A-9.45

1. Comment noted.
2. Comment noted.
3. The Project construction as analyzed in the EIR is set forth in Table 3-3. The 2022 Traffic Analysis identifies improvements for each analysis scenario and identifies when the improvements would be needed to address operational deficiencies. Table 1.4 of the 2022 Traffic Analysis outlines the Project’s fair share costs for operational deficiencies at off-site intersections. PDF-TRA-4 requires the Project to pay said fair share costs. It would be up to the individual jurisdictions to implement any improvements.
4. Comment noted.
5. Refer to Response A-9.4, above, regarding MM-TRA-2, Barton Street Traffic Safety Plan.
6. Comment noted on the request to include a condition to work with the City of Riverside to ensure that Project truck traffic adheres to adopted truck routes.

STONE CREEK RESIDENTS FOR SMART GROWTH LETTER O-4

COMMENT O-4.4

Traffic: As it reads today, your Draft Environmental Impact Report has several deficiencies in its traffic analysis. Local communities are already negatively impacted by mega-warehouse complexes and truck traffic, and it is important that your DEIR be accurate in how it will add to the congestion on local streets and freeways.

1) Your DEIR does not account for the 215/60 corridor, even though the freeway is within a mile of the site; and ostensibly, this is the route the trucks will use. The 215 is already overburdened with

truck traffic, and our local infrastructure is paying the cost to our roads. Please consult with CalTrans and include the 215/60 corridor in your traffic analysis for the final EIR to reflect the reality of how our local area will be impacted.

RESPONSE O-4.4

Refer to Response I-74.2, below, regarding 2022 Traffic Analysis for I-215 and the 215/60 corridor. Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

COMMENT O-4.5

2) Your DEIR does not account for the reality that truck drivers do not follow agreed-upon routes. Anyone who drives Alessandro or Van Buren have seen six-axle trucks lumbering down the road and tearing up roads in spite of the signs prohibiting them. City police are understaffed for the task of ticketing and enforcing the approved routes daily. What is the plan to enforce and maintain agreed-upon routes? Who will be responsible? Will they be given resources to enforce the rules? At the very least, the project applicant should include mitigation measures that require occupants of the warehouses to pay an infrastructure fee to local jurisdictions for the cost to our roads and to our police.

RESPONSE O-4.5

Refer to Response A-7.2, above, regarding truck route enforcement.

Commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).¹

KARRIE BRUSSELBACK LETTER I-74

COMMENT I-74.2

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van

¹ <https://www.dmv.ca.gov/portal/dmv-research-reports/department-of-motor-vehicles-dmv-performance-reports/where-did-your-2020-fees-go/>

Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built?

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project.

RESPONSE I-74.2

I-215 Freeway and 215/60 Corridor

The March JPA has adopted its own guidelines for traffic analysis: the March JPA Traffic Impact Study Guidelines, dated February 10, 2020 (March JPA Guidelines). As March JPA is the lead agency for this Project, the 2022 Traffic Analysis was developed pursuant to the March JPA Guidelines, rather than the WRCOG or County of Riverside Transportation Planning guidance documents. Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. As such, Caltrans does not utilize peak hour intersection operations analysis and instead utilizes VMT in compliance with SB 743 through its VMT-Focused Transportation Impact Study Guide (Caltrans VMT Guide), dated May 20, 2020. The March JPA Guidelines were adopted before the Caltrans VMT Guide and reference superseded Caltrans guidance. The 2022 VMT Analysis was prepared in compliance with the Caltrans VMT Guide and meets the transportation analysis requirement for Caltrans.

Pursuant to Caltrans safety requirements, the 2022 Traffic Analysis included an assessment of the I-215 off-ramps at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard to ensure there is no queuing, or back-up, onto the freeway mainline. These I-215 off-ramps were selected because the Project is anticipated to contribute 50 or more peak hour trips to these off-ramp intersections, consistent with the March JPA Guidelines. The 2022 Traffic Analysis performed a queuing analysis for these I-215 Freeway off-ramps for all scenarios (Existing [2021], Existing plus Project, Existing plus Ambient Growth plus Project, Opening Year [2028] Cumulative Without Project, Opening Year [2028] With Project, Horizon Year [2045] Without Project, and Horizon Year [2045] With Project). Based on the results of this queuing analysis, there are no study area off-ramps that are anticipated to experience queuing issues under any scenario. Caltrans is one of the state reviewing agencies for the Project, and had the opportunity to comment on the transportation analysis. <https://ceqanet.opr.ca.gov/2021110304>. Caltrans did not submit any comments on this Project.

To improve regional operational conditions, Caltrans, in conjunction with the Riverside County Transportation Commission (RCTC), has completed a number of I-215 Freeway regional improvement projects. The I-215 Freeway South project widened I-215 to provide an additional general-purpose lane in each direction between Murrieta Hot Springs Road and Scott Road. The I-215 Central project widened I-215 to provide an additional general-purpose lane in each

direction between Scott Road and Nuevo Road. The latest improvement along the I-215 Freeway corridor is the new interchange at Placentia Avenue that was completed in late 2022. A future planned I-215 Freeway North project proposes to add one carpool lane in each direction of travel between Nuevo Road and the SR-60 Freeway in addition to implementing a new westbound auxiliary lane to improve traffic merging with the SR-60 Freeway. Another regional facility is the Mid-County Parkway (MCP) which is an east-west transportation corridor generally running along the alignment of Ramona Expressway. The first phase of the MCP includes the recently completed Placentia Avenue interchange at the I-215 Freeway and the second phase is currently under design and is anticipated to go into construction in 2025. The second phase of the MCP project will construct an additional lane in each direction (in addition to other design features along the corridor) between Pico Avenue and Warren Road along Ramona Expressway.

To address identified intersection/roadway segment deficiencies, Table 1-4 of the 2022 Traffic Analysis recommends off-site improvements and the Project's fair share contribution thereto. For each analyzed scenario, the 2022 Traffic Analysis discloses conditions "Without Improvements" and conditions "With Improvements."

Cumulative Projects

To ensure that the 2022 Traffic Analysis satisfied the March JPA Guidelines, Urban Crossroads, Inc. prepared a Project traffic analysis scoping package for review by March JPA staff prior to the preparation of the 2022 Traffic Analysis. The December 22, 2021, scoping agreement provides an outline of the Project study area, trip generation, trip distribution, analysis methodology, and cumulative project list and map. The agreement is included in Appendix 1.1 of 2022 Traffic Analysis. The scoping agreement was also shared with the County of Riverside, City of Riverside, and City of Moreno Valley for review and comment, and those comments were taken into consideration as part of the 2022 Traffic Analysis. The scoping agreement expressly requested the agencies provide the latest cumulative projects.

The March JPA Traffic Impact Study Guidelines utilizes a 5-mile radius around the Project site for determination of approved and pending projects for cumulative analysis. This is consistent with traffic study guidelines for WRCOG, County of Riverside, and the cities of Riverside and Moreno Valley. The 5-mile radius is intended to capture all of the regional intersections where the Project would contribute 50 or more peak hour trips. This also captures the areas where the Project would have more concentrated air quality and GHG impacts.

The 2022 Traffic Analysis included cumulative development projects within 5 miles of the Project site that were known at the time of the Project Notice of Preparation, dated November 18, 2021. Both the Stoneridge and World Logistics Center projects are just over 8-miles from the Project site. The 2022 Traffic Analysis cumulative list was developed in coordination with and reviewed by the March JPA, City of Riverside, City of Moreno Valley, and County of Riverside.

Smaller projects and projects located a greater distance from the Project, such as Stoneridge and World Logistics Center, are accounted for through the application of the ambient growth

factor. The 2022 Traffic Analysis added an ambient growth factor of 14.87%² to existing (2021) traffic volumes for Opening Year (2028) Cumulative conditions in addition to traffic manually added to account for the listed cumulative projects and proposed Project. Cumulative traffic for Horizon Year (2045) conditions is based on the Riverside County Model (RIVCOM) (a traffic model representing 2045 conditions for the Western Riverside County region), which includes traffic associated with projects such as Stoneridge and World Logistics Center.

Roadway Segment and Intersection Analysis

The 2022 Traffic Analysis analyzed the Project's effects on traffic on truck routes, other roadways, and intersections located within the March JPA, City of Riverside, City of Moreno Valley, and County of Riverside. The scope of the study area was based on input provided by March JPA, the City of Riverside, City of Moreno Valley, and County of Riverside. Study area intersections at a minimum include locations where the Project would contribute 50 or more peak hour trips (consistent with the minimum standards used by these same agencies). This 2022 Traffic Analysis included 15 roadway segments (see Table 1-2), including 9 truck route segments, and 38 intersections (see Table 1-1 and Exhibit 1-2), including eight intersections along Alessandro Boulevard, and seven intersections along Van Buren Boulevard. Urban Crossroads, Inc. worked closely with these agencies to determine travel patterns for Project traffic, including truck traffic. As shown on Exhibits 4-1 and 4-2, Project traffic is not anticipated to utilize Krameria Avenue in any substantial way. The 2022 Traffic Analysis conforms to the March JPA Guidelines and the 2021 scoping agreement.

COMMENT I-74.3

I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety.

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement?

RESPONSE I-74.3

Refer to Response A-7.2, above, regarding truck route enforcement.

COMMENT I-74.5

How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality,

² Additional ambient background traffic that is calculated at 2.0% per year compounded annually over 7 years, or 14.87%.

and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

RESPONSE I-74.5

Traffic studies provide the best representation of anticipated traffic flows and volumes and are based on data gathered from existing developments and local conditions. The models used are routinely revised to incorporate updated information. As required by Section 5.5.4 of the March JPA Guidelines, Urban Crossroads prepared figures illustrating the percentage of Project peak hour traffic going to and from various destinations along the transportation network. As stated in the 2021 scoping agreement:

“The Project trip distribution and assignment process represents the directional orientation of traffic to and from the Project site. The trip distribution pattern of passenger cars is heavily influenced by the geographical location of the site, the location of surrounding land uses, and the proximity to the regional freeway system. The trip distribution pattern for truck traffic is also influenced by the local truck routes approved by the March JPA, City of Riverside, City of Moreno Valley, and Caltrans. Truck traffic will be directed to utilize Cactus Avenue to the I-215 Freeway; however, it is anticipated some trucks may use Meridian Parkway to head north or south. Given these differences, separate trip distributions were generated for both passenger cars and truck trips.”

At the request of the March JPA, passenger car and truck trip distributions are consistent with other March JPA projects within the immediate vicinity. The trip distribution figures were shared with the County of Riverside, City of Riverside, and City of Moreno Valley as part of the scoping agreement for review and comment, and those comments were taken into consideration as part of the 2022 Traffic Analysis.

Charlene So P.E., of Urban Crossroads has worked in transportation planning and traffic engineering since 2002. Since earning her Bachelor of Science degree in Civil Engineering from the University of California, Irvine, Ms. So has developed a wide range of expertise in transportation planning and traffic impact analyses. She is a registered professional traffic engineer in the State of California. Ms. So is an experienced project manager leading the traffic group and traffic engineer who is familiar with the analysis techniques of the most current Highway Capacity Manual. Further, March JPA, the County of Riverside, City of Riverside, and City of Moreno Valley are experts with regards to traffic flow and patterns within their jurisdictions.

Refer to Response A-7.2, above, regarding truck route enforcement.

JERRY SHEARER LETTER I-788

COMMENT I-788.8

The first area I have serious concerns about is the traffic section of the document. The traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the

215 Freeway. CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. Since the 2003 settlement agreement specifies that you work to reduce traffic on these streets, and you have not included this settlement in the draft EIR, it is clear that you do not intend to adhere to the settlement requirements and guidelines. How do you justify not considering the main truck traffic routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Why don't you consider the cumulative impacts for traffic within a five-mile radius of this project? Ignoring it is irresponsible.

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives or travels in this region knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project.

I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, at 4:00 AM on 2/2/23 a semi-truck overturned carrying a heavy shipping container and blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This driver knew he was driving down a road that prohibited the type of truck he was driving but he did it anyway because he was trying to find the quickest route to his destination. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. This fact is also in violation of the 2003 settlement agreement and is difficult to monitor by law enforcement. Your plan does not account for the 2003 settlement and does not help mitigate this kind of problem on the streets surrounding the Upper Plateau.

RESPONSE I-788.8

Refer to Response I-74. 2, above, regarding 2022 Traffic Analysis for I-215 and the 215/60 corridor, cumulative projects, and roadway segment and intersection analysis. Refer to Response A-7.2, above, regarding truck route enforcement.

Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

COMMENT I-788.10

Why was it not considered as part of your plan? What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the

traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. Please redo your traffic study to reflect the actual conditions of the surrounding area.

RESPONSE I-788.10

Refer to Response A-7.2, above, regarding truck route enforcement. Refer to Response I-74.5, above, regarding traffic study methodology.

COMMENT I-788.29

Another area where the draft EIR does not sufficiently address the cumulative impacts of these buildings is in how they will adversely impact traffic beyond the immediate roads surrounding the project site. The traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, Cal Trans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main truck traffic routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Why have you ignored the cumulative impacts traffic will cause within a 8-mile radius of these buildings?

If you insist on moving forward with this negligent plan, please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. Your poor land use decisions will have a significant and lasting impact on the lives of the residents of western Riverside County and at this time I see no reason to believe you have considered how to mitigate this major oversight.

I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on February 2, 2023 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety.

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. What financial demands would you make of the developer to account for all the damage they are causing our neighborhoods? Will you leave the burden of cost to fix roads, police wrong-doers, and provide essential services to these monstrous warehouses to the public via higher taxes and bond measures? Is the March JPA operating in direct conflict with the spirit and words of the General Plan?

RESPONSE I-788.29

Refer to Response I-74.2, above, regarding 2022 Traffic Analysis for I-215 and the 215/60 corridor, cumulative projects, and roadway segment and intersection analysis. Refer to Response A-7.2, above, regarding truck route enforcement. Refer to Response I-74.5, above, regarding traffic study methodology. Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

JEN LARRATT-SMITH LETTER I-790

COMMENT I-790.13

Your omission of the 215 freeway from your analysis is grossly deficient. The freeway is less than one mile from the project, and the route you've determined the trucks will travel, yet you do not analyze the impact it would have on existing traffic conditions. You also failed to consult with Caltrans about the project. Anyone who drives on 215 near the 60 interchange has experienced gridlock at all hours of the day. Often when I drive this area of the freeway, my car is hemmed in by six-axle trucks. And this is describing existing traffic conditions. Your traffic analysis does not include cumulative impacts. It does not acknowledge the traffic that will be generated by other mega-warehouse projects in the area which have already received approval like the World Logistics Center. Your responsibility in assessing cumulative impact is not simply to look at current conditions but what conditions are likely to be in the year when the project is built, so your failure to include the nearby approved but unbuilt warehouse projects makes your analysis deficient according to CEQA.

You also do not analyze the potential impact on arterial streets such as Alessandro and Van Buren. While the truck routes you create are supposed to avoid these streets, anyone who drives these streets regularly to drop kids off at school or to work (as I do) know that semi-trucks violate their established truck routes all the time. Sometimes when police pull over trucks to cite drivers or when a trucker gets into an accident on one of these City streets, it backs the traffic up for hours

making my children miss their morning classes. Moreover, the trucks' illicit use of these routes is precisely because of the aforementioned back up on the 215 and the 60.

In your DEIR analysis, you ought also to consider that trucks do 2,500 times the damage of a car to our streets and highways. The impact of over 2000+ diesel trucks daily on our roads will be immense. These details need to be better factored into the maintenance costs for local roads and highways in your Final EIR.

RESPONSE I-790.13

Refer to Response I-74.2, above, regarding 2022 Traffic Analysis for I-215 and the 215/60 corridor, cumulative projects, and roadway segment and intersection analysis.

Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

Roadways that handle truck traffic are typically designed with additional structural support to account for number of heavy trucks. Refer to Response O-4.5, above, regarding fees paid by commercial trucks.

MICHAEL MCCARTHY LETTER I-831

COMMENT I-831.2

The draft EIR Transportation analysis (section 4.15 and Appendix N) fails to adequately evaluate the regional impacts transportation of the proposed project and omits tens of millions of square feet of present and probably warehouse development along the I-215 and SR-60 corridors. The I-215 freeway is already one an incredibly overloaded route jam-packed with trucks that bottleneck at the 215-60 interchange for 6+ hours a day; the additional trucks and passenger vehicle trips from the Project will significantly exacerbate that problem. However, the project didn't evaluate the 215/60 corridor or vehicle traffic and capacity along the 215 freeway, which is inconsistent with both WRCOG and County of Riverside guidance as well as the stated geographic scope of the transportation cumulative impacts analysis in Table 4-1. As a result, the project's transportation analysis is insufficient for evaluation and disclosure under CEQA and should be redone in full consultation with CalTrans to appropriately model the freeway impacts along the 215/60 interchange of the cumulative considerable warehouse traffic on that key piece of infrastructure.

RESPONSE I-831.2

Refer to Response I-74.2, above, regarding 2022 Traffic Analysis for I-215 and the 215/60 corridor and compliance with the Caltrans VMT Guide. Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

COMMENT I-831.4

Finally, the project makes a number of flawed baseline assumptions in generating trip rates, bases its traffic estimates on a collection day two days after a major holiday, and provides nonsensical estimates of traffic that are physically and mathematically impossible.

RESPONSE I-831.4

Refer to Responses I-834.7 and I-834.8, below, regarding trip generation. Refer to Response I-834.10, below, regarding traffic estimates.

As explained in the 2022 Traffic Analysis, existing traffic conditions are based on the traffic volumes observed during the peak hour conditions using traffic data based on an adjustment of both historic (2019) traffic count data and new (2021) traffic count data collected on Tuesday, November 30, 2021. Although the Thanksgiving holiday was the previous week, traffic patterns and volume would have returned to normal by the time of the 2021 traffic count. Typically, holiday traffic increases the weekend after Thanksgiving and returns to normal the following week. As stated in the 2022 Traffic Analysis, there were no observations made in the field that would indicate atypical traffic conditions on the count date, such as construction activity or detour routes and nearby schools were in session and operating on normal schedules.

Further, traffic counts were adjusted due to the currently ongoing COVID-19 pandemic. Adjusted factors were calculated based on historic (2019) traffic counts in conjunction with a 2.0% per year growth rate (compounded annually) to reflect 2021 conditions and compared to new (2021) traffic count data at the same intersections. Other locations where historic count data was not available, the traffic counts were adjusted and increased from the 2021 collected data based on a factor derived from the locations with both historic and 2021 traffic count data.

COMMENT I-831.5

In Table 4-1, the geographic scope of the Transportation Analysis is defined as 'Regional'. On p. 4.15-8, that regional definition is scoped as a '15-mile service area' from the Project site and displayed in Attachment B. However, the Cumulative Impacts project table in Table 4-2 definitely does not include all cumulatively considerable warehouse projects within 15 miles of the project, and certainly excludes regionally significant projects such as the 40 million square foot World Logistics Center and the 9.5 million square foot Stoneridge commerce center, both of which are less than 10 miles from the Project site and both of which will influence regional traffic patterns. In addition the project omitted nearby warehouses that are planned or approved including projects in Moreno Valley (Edgemont Commerce Center, Moreno Valley Business Center, Compass Danbe Centerpointe, PAMA business park, Heacock Commerce Center), Mead Valley (Majestic Freeway, Seaton and Cajalco, Rider and Patterson, Placentia Logistics, Harvill and Rider, and Harvill Business Center) and Perris (First March Logistics, Duke Warehouse Project, Phelan Warehouse, Operon HKI, OLC3 warehouse, Ramona Indian Warehouse, Perris Valley Commerce Center, and the Ramona Gateway). Figure 1 shows a regional warehouse map with a 15-mile project zone circle.

Each of the warehouses mentioned above are along the 215/60 corridor and truck traffic and passenger vehicles will all cumulatively add to existing traffic on the 215 Freeway. Additional large

warehouse complexes along the SR-60 include the planned *Beaumont Pointe¹* and *Legacy Highlands Phase II²* projects, which are cumulatively about 25 million additional square feet and are likely to generate significant truck and passenger traffic along SR-60.

I personally commute to Claremont from the Mission Grove neighborhood, and despite the 215 Alessandro freeway entrance being less than 3 miles from my house, it is ALWAYS faster to take Alessandro to Canyon Crest and enter the 215/60 freeway from Martin Luther King Blvd adjacent to UC Riverside rather than go through the 215/60 interchange. Similarly, when I want to go to Curry and Kebab³ in the Canyon Springs shopping center on Day Street right next to the 215-60 interchange, I always take surface streets (Sycamore Canyon to Box Springs) because it is faster and the interchange is a complete disaster.

What use is the 215 freeway if a route with a one-lane surface street (Canyon Crest Dr.) with multiple traffic lights is a guaranteed faster route 100% of the time? It is absurd that City of Riverside residents can't use the primary freeway entrance nearest their home because it is infinitely slower than taking a one-lane surface street during any daytime commuting hour.

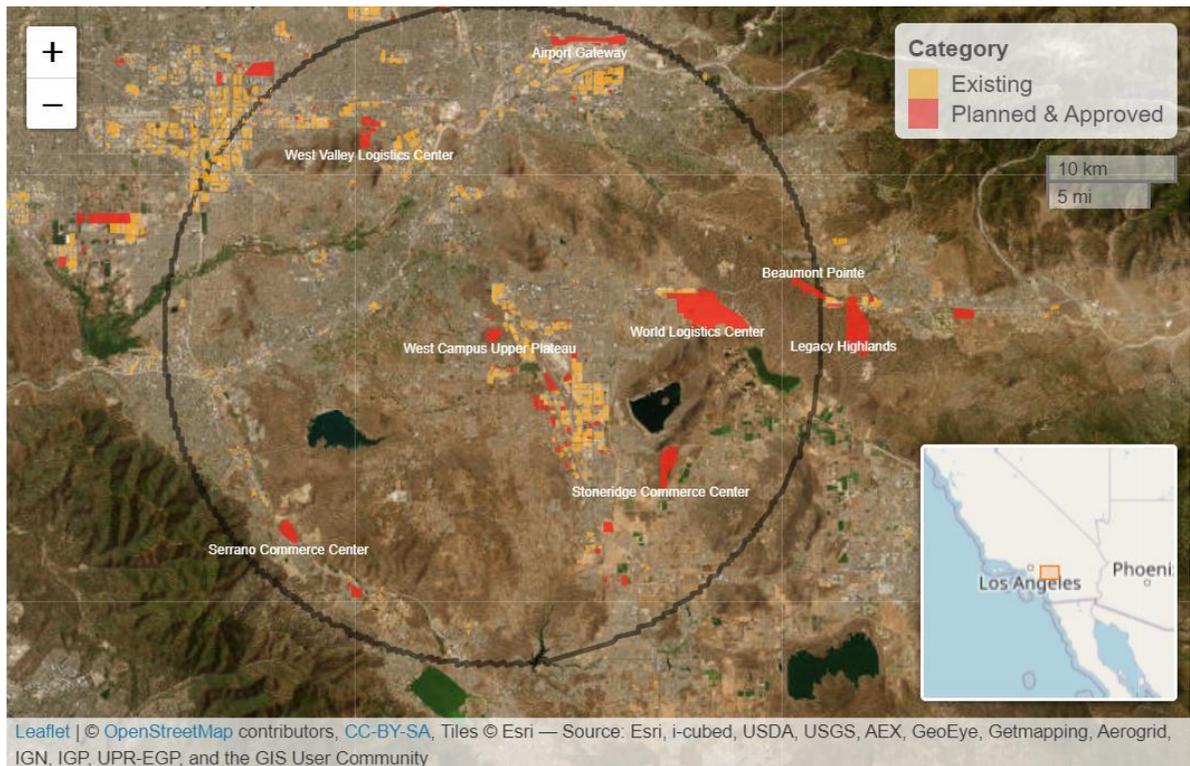


Figure 1. Map of project area with a 15-mile buffer for the regional transportation analysis that shows existing warehouses in orange and planned/approved warehouse plans in red. Projects that are approximately 5 million square feet or larger are labeled.

Therefore, I ask that

- 1) the March JPA justify how a regional traffic analysis with a defined (Appendix N – Attachment B) 15-mile service area can exclude the primary freeway (I-215) and primary freeway interchange (215/60) from its analysis of transportation impacts.

- 2) *the March JPA justify its failure to consult with CalTrans on a project that will add significant traffic to the 215 Freeway (~20,000 passenger trips, ~2,000 truck trips, per Appendix N, Exhibits 4 & 5) and is less than 1 mile from the 215 freeway, in contravention of WRCOG and County of Riverside guidance? "For projects within one mile of a state highway, or any project that may add traffic on the state highway, the Engineer shall also coordinate with Caltrans." (WRCOG 2020, County of Riverside 2020)⁴*
- 3) *the March JPA justify its exclusion of more than 60 million square feet of planned and approve new warehouses that are within the 15-mile service area from the cumulative impacts project list.*
- 4) *the March JPA justify its exclusion of March JPA commercial cargo flights from this analysis of transportation impacts – this project, in cumulatively considerable effect with the 60 millions square feet of planned and approved warehouses in the 15 mile service area, is likely to induce additional commercial cargo operations out of the March ARB inland port. Those are not included in the transportation modeling, but need to be included in the transportation, air quality and noise sections as part of the cumulative impact of this project on the local community.*
- 5) *Justify the Cumulative Effects on VMT in the context of the more than 50,000 jobs projected to be created within the 15-mile service area and the less than 11,000 unemployed residents currently available to work given the 3.7% unemployment rate in December 2022. There are no workers for these jobs locally.*

RESPONSE I-831.5

1) The 15-mile service area identified by the commenter signifies the bounds of the region utilized by the 2022 VMT Analysis to determine if the addition of the Project's retail component would result in a net increase in total VMT for that region. As explained in the 2022 VMT Analysis, a 15-mile service area is a conservatively estimated distance from the Project as the retail component is not anticipated as a regional shopping destination, but instead is anticipated to serve the surrounding communities of Riverside, Moreno Valley, Perris, etc. Refer to Response I-74.2, above, regarding 2022 Traffic Analysis for I-215 and the 215/60 corridor.

2) Refer to Response I-74.2, above, regarding 2022 Traffic Analysis for I-215 and the 215/60 corridor.

Regarding commenter's concerns about trucks accessing local roads, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Under PDF-TRA-1, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway. Refer to Response A-7.2, above, regarding truck route enforcement.

3) Separate from the 2022 VMT Analysis, the 2022 Traffic Analysis utilizes a 5-mile radius around the Project site for determination of approved and pending projects for cumulative analysis as required by the March JPA Guidelines. The cumulative analysis depends on data from the

RIVCOM model. In other words, the cumulative analysis relies upon Riverside County's model, and not solely on information from the proposed Project. Refer to Response I-74.2, above, regarding cumulative projects.

4) Because the March ARB/Inland Port Airport is a joint use airport, civilian flights, including commercial cargo flights, are limited through a Joint Use Agreement between the March JPA and the U.S. Air Force.⁴ Additional flights can only be approved after environmental review through CEQA and NEPA.⁵ No additional flights are proposed as a part of this Project. No revisions to the 2022 Traffic Analysis or other impact analyses are required.

5) The commenter references employment growth projection within the 15-mile service area of 50,000 new jobs and an estimated unemployment rate of 3.7% as of December 2022, however, it should be acknowledged that it will take an as of yet undetermined amount of time for the estimated 50,000 new jobs stated by the commenter to materialize as they are projected from new development projects that are as of yet not fully entitled, yet to be constructed and/or not fully occupied. It is also important to note that consistent with SCAG growth projections for the region, as employment opportunities grow within the service area so does population.

COMMENT I-831.7

The Project Trip Generation Rates used in Table 4.15-1 use extremely liberal assumptions about the truck trip generation rates and the allocation of office/warehouse space in the business park and mixed-use land-use categories.

The South Coast Air Quality Management District Rule 2305 – warehouse indirect source rule – requires warehouse operators to collect and report truck trip rates. Under 2305(d)1(C) – the weighted average truck trip rates are defined as

WTTR = Weighted Truck Trip Rate, where:

Warehouses >200,000 = 0.95 trips/tsf/day

Warehouses >100,000 = 0.67 trips/tsf/day

Cold Storage Warehouses = 2.17 trips/tsf/day

Where tsf = thousand square feet.

Using the SCAQMD WTTR rates instead of truck trip generation rates from the ITE and WSP yields a near doubling of truck trip estimates. The basic business-park and mixed-use warehouses of ~100,000 square feet are nearly identical to the SCAQMD rates (0.57 vs. 0.67). High-cube fulfillment center warehouses greater than 200,000 square feet have a very low truck trip generation rate from ITE Trip Generation Model and WRCOG's truck trip survey (0.379 vs. 0.95). Similarly, the cold storage warehouse indicate extreme differences in truck trip generation rates (0.75 vs. 2.17). The weighted truck trip rates would generate nearly double the number of daily truck trips as the default rates selected by the March JPA and project applicant.

⁴ https://www.marchjpa.com/documents/docs_forms/joint_use_agreement.pdf

⁵ <https://marchjpa.com/wp-content/uploads/2022/05/MIP-Carrier-req-for-Operational-status-instructions-2021.pdf>

Table 1. Contrasting the truck-trip rates from SCAQMD vs. the Project ITE based truck trip rates.

	Warehousing	High-cube fulfillment center	Cold storage	Total
total trip rate	12.44	2.129	2.12	
passenger trip rate	11.87	1.75	1.37	
Truck rate per TSF (Project)	0.57	0.379	0.75	
Rule 2305 truck rate per TSF	0.67	0.95	2.17	
Difference in truck rate	0.1	0.571	1.42	
Cumulative warehouse sq.ft.	1763168	2617000	500000	4880168
Current truck trips	1005	992	375	2372
Extra daily truck trips	176	1494	710	2381

Using the SCAQMD Rule 2305 weighted truck trip rates results in a more than doubling of truck trips for the project. That would seem to suggest that the default truck trip rates from ITE and WRCOG are likely to be underestimates of true truck trip rates.

RESPONSE I-831.7

The comment states that Project truck trips should be evaluated based on SCAQMD Rule 2305 rather than ITE trip rates. The Institute of Transportation Engineers (ITE) trip generation rates are the industry-accepted forecast for trip generation of development projects and is currently the best data available for forecasting trip generation. As described by South Coast Air Quality Management District (SCAQMD):

“[The] 2014 SCAQMD High Cube Warehouse Truck Trip Study was a multi-year effort that concluded with the Institute of Transportation Engineers (ITE) – the preeminent national organization for transportation engineers – completing the analysis and incorporating it into their industry standard Trip Generation Manual. This manual is the basis for the vast majority of transportation engineering studies conducted for development projects in South Coast AQMD and throughout the nation, and continues to be used today. The trip rates are also incorporated into CalEEMod, the primary model used throughout the state to estimate air quality impacts from new development, including for warehousing.

While different types of warehousing will have different trip characteristics, the use of the ITE trip rates provide the most reasonable average to consider a large population of warehouses”.⁶

On May 7, 2021, SCAQMD adopted Rule 2305 - Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Owners and operators associated with warehouses 100,000 square feet or larger are required to directly reduce nitrogen oxides (NO_x) and particulate matter emissions, or to otherwise facilitate emission and

⁶ <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>

exposure reductions of these pollutants in nearby communities. The rule imposes a “Warehouse Points Compliance Obligation” (WPCO) on warehouse operators. Operators satisfy the WPCO by accumulating “Warehouse Actions and Investments to Reduce Emissions Points” (WAIRE Points) in a given 12-month period. WAIRE Points are awarded by implementing measures to reduce emissions listed on the WAIRE Menu, or by implementing a custom WAIRE Plan approved by the SCAQMD in its [WAIRE Implementation Guidelines](#), dated June 2021.

To calculate WAIRE Points, warehouse operators collect actual truck trip data using methods that provide a verifiable and representative record. The weighted truck trip rates listed in Rule 2305(d)(1)(C) and cited by the commenter only applies if a warehouse operator does not have information about the number of truck trips due to a force majeure event such as destruction of records due to a fire. As stated in footnote 3 of the WAIRE Implementation Guidelines, this alternative calculation can *only* be used in cases of force majeure. As shown in Table 4 of the May 7, 2021, SCAQMD staff report,⁷ these trip rates are not actual trip rates but weighted.

Table 4: Truck Trip Generation Rates Used for Default WTTR in Case of Loss of Records due to Force Majeure

Warehouse Type	Class 8 / Tractor-Trailer / 4+ Axle (Average daily trips per 1,000 sq. ft. of warehouse building area) [^]	Class 2B-7 / ‘Straight’ Trucks / 2- and 3-Axle (Average daily trips per 1,000 sq. ft. of warehouse building area) [^]	Weighted Truck Trip Rate (WTTR) (2.5 × Class 8 + Class 4-7)
High Cube Transload & Short Term Storage (≥200k sf)	0.33	0.12	0.95
Warehouse (100k – 200k sf)	0.21	0.14	0.67
Cold Storage (>100k sf)	0.75	0.29	2.17

In developing Rule 2305 unweighted truck trip generation rates, SCAQMD utilized the 2016 ITE High-Cube Warehouse Vehicle Trip Generation Analysis and supplemented with data from the City of Fontana’s 2003 Truck Trip Generation Study.⁸ To estimate the Project’s truck trip generation, the 2022 Traffic Analysis used trip-generation statistics published in the ITE Trip Generation Manual (11th Edition, 2021) and the WRCOG High Cube Warehouse Trip Generation

⁷ <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>

⁸ May 2021 SCAQMD Final Staff Report – Rule 2305, pg. 47;

<https://www.ite.org/pub/?id=a3e6679a%2De3a8%2Dbf38%2D7f29%2D2961becdd498;>

<https://tampabayfreight.com/pdfs/Freight%20Library/Fontana%20Truck%20Generation%20Study.pdf>.

Study (WSP, January 2019), as these were the best available sources of data at the time of preparation.

Table I-831.7-1 compares the truck trip generation rates used in the 2022 Traffic Analysis to the unweighted truck trip generation rates used in Rule 2305 and demonstrates the estimated truck trips are substantially the same.

Table I-831.7-1

	Project TSF	ITE Truck Rate	ITE Truck Trips	Rule 2305 Unweighted Truck Rate	Rule 2305 Truck Trips
High-Cube	2,562.561	0.379	972	0.45	1,154
Warehouse	1,234.218	0.57	706	0.35	432
Cold Storage	500	0.75	376	1.04	520
TOTAL	4,296.779		2,054		2,106

The ITE Trip Generation Manual remains the best estimation of trips for a proposed development and is the industry standard for trip generation. The trip rates within the Trip Generation Manual are based on studies of existing similar use developments and the generated traffic from those developments. As such, the no changes are necessary to the 2022 Traffic Analysis since the trip generation is consistent with the industry standard and is the accepted methodology per the March JPA and the other surrounding agencies.

Utilizing the trip generation rates based on Rule 2305, the proposed Project would only generate an additional 52 peak hour trips. This number is further reduced when applied to the study area, based on the proposed Project trip distribution. In other words, not all intersections and roadway segments would have an increase in 52 peak hour trips. Based on criteria widely utilized within the traffic engineering industry, 50 peak hour trips generally represents the threshold at which traffic starts to affect intersections. The 50 peak hour trip criteria is widely utilized within Riverside County and is consistent with the March JPA Guidelines. As such, if trip generation were to utilize the unweighted Rule 2305 rates, the additional truck trips would be unlikely to affect the study area operationally.

COMMENT I-831.8

Secondarily, and of far less overall importance, the mix of business-park to office use in the project is not realistic. Approved, constructed, and planned Warehouses in the March JPA South Campus have universally had office space occupying less than 10% of total building floor space while warehouse is greater than 90% (see e.g., buildings E, F, G, H, I, 1, 2, and 3). Given that those warehouses are recently built/approved/constructed and are approved by the same agency, it seems reasonable to use those warehouse/office ratios, rather than default ITE ratios that drastically overestimate the amount of office space in modern warehouses.

If the ratio switched to follow a 90:10 ratio instead of a 70:30 ratio as used in Table 4.15-1, then the number of passenger car trips basically stays the same (20226 daily trips vs 20696 trips), but the timing of the trips going from office trips to warehouse trips shifts the timing to afternoon peak hours, exacerbating the evening peak hour trip. Importantly, the shift to a more appropriate warehouse ratio increases the number of estimated truck trips by 28% adding another 200 daily truck trips based on the 0.57 truck trip ratio.

RESPONSE I-831.8

The trip generation rates utilized for the proposed Project are shown in Table 4-1 of the 2022 Traffic Analysis and obtained from the ITE Trip Generation Manual (11th Edition, 2021) and the WRCOG High Cube Warehouse Trip Generation Study (WSP, January 2019) for the industrial uses. These sources are the industry standard in determining the proposed Project trip generation, as they are based on data from similar use facilities. The land uses evaluated in the 2022 Traffic Analysis are the most similar land use types to the function and operations of the proposed Project. Based on the ITE description for Business Park, the average mix is 20 to 30 percent office/commercial and 70 to 80 percent industrial/warehousing. As such, 30% of the business park area has been designated as office related uses, while the remaining 70% of the business park area has been allocated to warehousing uses. This 30/70 split is not intended to reflect office space within a warehouse but rather to capture other foreseeable uses allowed with the Business Park land use designation under the proposed West Campus Upper Plateau Specific Plan. As such, no revisions to the 2022 Traffic Analysis are necessary based on this comment.

COMMENT I-831.10

Appendix N provides many exhibits indicating the increased increment of traffic volumes at various intersections near the project because of modeled project and cumulative impact traffic volumes. However, the modeled traffic volumes include many examples of impossible results.

Starting with Appendix N - Exhibit 3-17 - Existing (2021) Weekday Traffic Volumes. Existing ADT volumes were reportedly based on 'factored intersection peak hour counts collected by Urban Crossroads, Inc. using the following formula for each intersection leg:

Weekday PM Peak Hour (Approach volume + Exit volume) x 10.20 = Leg Volume"

5 Trautwein Rd. & Alessandro Blvd.		24 Meridian Pkwy. & Alessandro Blvd.	
42,850		44,050	
← 3031(1882)		18,850	↑ 535(535)
↑ 157(234)		↓ 126(126)	← 1941(1941)
← 1847(893)		↓ 114(114)	↑ 87(87)
↑ 7(11)		↓ 87(87)	↑ 535(535)
1015(1782) →	↑ 1847(893)	140(140) ↓	← 1941(1941)
4(17) ↓	↑ 7(11)	963(963) →	↑ 87(87)
12,250		244(244) ↓	↑ 585(585)
48,550		585(585) ↑	↑ 585(585)
		61(61) ↓	↑ 61(61)
		45,400	23,600

Exhibit 3-17 from Appendix N.

However, the basic numbers don't add up in many of the intersections in Exhibit 3-17. For example, Trautwein Rd. & Alessandro Blvd. has three ADT, (Peak AM, Peak PM) values as 42,850, (3,031, 1,882) - (top right), 48,550 (1,015, 1782) (bottom left) and 12,250 (1,847, 893) (bottom right). As you may notice, if you multiply the peak afternoon value (1782) by 24 hours, you get a value of 42,786, which is less than the average daily traffic value of 48,550. The math just doesn't work to reproduce the average daily traffic given that daily average is greater than the peak X 24.

Similarly, Meridian Blvd. and Alessandro Blvd. show that the average peak AM and PM rates in the bottom-left are 963+140+244 = 1347. Multiplying the peak 1,347 hour by 24 hours yields 32,238 daily trips, which is more than 25% lower than the average volume of 45,400 reported on the figure.

I am confused why these numbers don't add up for the EXISTING traffic volumes. It appears that the base traffic volumes were entered incorrectly or in the wrong directions for the lane of traffic. Given the mathematically inconsistent existing traffic volumes, it is very clear that starting with a garbage input will result in a garbage output and that the predicted volumes will simply compound the errors.

Another obvious example of a physical impossibly modeling result is seen in Exhibit 4-3, which is the Project Only Weekday Traffic Volumes. We note for completeness that multiple traffic volumes exhibit the same kinds of daily peak vs. average volumes that lead to mathematically nonsensical results. More importantly, there are physically nonsensical results. In the Barton St. and Grove Community Dr. intersection, traffic is projected to occur at 4 different direction. However, Barton St. and Grove Community Dr. is a 3-way intersection. This result is nonsensical as a project level impact.



Exhibit 4-3 from Appendix N and a map of the 3-way intersection modeled as a 4-way intersection.

Thus, I ask the March JPA to

- 1) Justify existing project traffic counts that have average daily traffic volumes greater than peak daily traffic volumes times 24 hours.
- 2) Justify modeling four-way traffic at a three-way intersection
- 3) Given that the modeling has basic input and non-physical entries in the results section, how can it credibly project the traffic volumes in the future given that the basic results are unreliable?
- 4) Please revise traffic results to identify why intersections were incorrectly modeled mathematically and physically

RESPONSE I-831.10

As discussed in the 2022 Traffic Analysis, existing weekday Average Daily Traffic (ADT) volumes are based on actual 24-hour tube count data. The traffic counts have been adjusted to include ambient growth to reflect 2021 traffic conditions (reflected in the ADT volumes). ADT volumes are calculated using the formula:

$$\text{Weekday PM Peak Hour (approach volume + exit volume)} \times 10.61^9 = \text{Leg Volume}$$

As discussed in the 2022 Traffic Analysis, the factored ADT volumes from the PM peak hour traffic volumes is based on the sum of all approach volumes and all exiting volumes, to accurately reflect all the traffic volumes on that specific roadway segment.

For the calculation of daily traffic volumes, the factor discussed above (10.61) has been utilized. Daily traffic volumes should not multiply the total peak hour traffic by 24, as the peak hour volume is generally higher than other hours of the day. Multiplying by 24 would overstate the

⁹ The text of the 2022 Traffic Analysis incorrectly stated the ADT factor as 10.20. The correct ADT factor is 10.61. The text has been corrected in the 2022 Traffic Analysis. The analysis used the correct ADT factor and no further revisions to the 2022 Traffic Analysis are required

daily traffic volumes. As such, a peak-to-daily ratio has been calculated using the above formula, to forecast the daily traffic volumes for a roadway segment.

5		Trautwein Rd. & Alessandro Blvd.	
		42,850	
		← 3031(1882)	
		↑ 157(234)	
1015(1782) →	↓ 4(17)	1847(893) →	7(11) ↑
48,550		12,250	

In the first example identified in the comment (Intersection #5 – Trautwein Rd. & Alessandro Blvd.), the west leg of Alessandro Boulevard has a total Weekday PM Peak Hour volume of 4,574, which is the sum of all entering leg volume (893 + 1,882) and exiting leg volume (1,782 + 17) for that segment. This total volume is then multiplied by the ADT factor discussed above (4,574 x 10.61), which equates to 48,530. This number is rounded to the nearest 50 on the traffic volume exhibits (in this case 48,550).

24		Meridian Pkwy. & Alessandro Blvd.	
18,950		44,050	
↓ 126(254)	↓ 114(490)	↑ 535(391)	
↓ 87(125)	← 1941(1515)		↑ 87(289)
140(131) ↓	↑ 585(443)	↑ 585(394)	↑ 61(77)
963(1430) →	23,650		
244(537) ↓			
45,750			

In the second example identified in the comment (Intersection #24 – Meridian Pkwy. & Alessandro Blvd.),¹⁰ the west leg of Alessandro Boulevard has a total Weekday PM Peak Hour volume of 3,999, which is the sum of all entering leg volume (443+1,515+254) and exiting leg volume (131+1,430+537) for that segment, which totals 4,310. This total is then multiplied by the ADT factor (4,310 x 10.61), which equates to 45,729. This number rounds up to 45,750.

The referenced report volumes on the exhibits present a conservative analysis and volume for the study area. Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. As such, there are no necessary changes to the 2022 Traffic Analysis.

As noted by the commenter, Exhibit 4-3 appears to show the incorrect lane configuration and volume for Intersection #12 – Barton St. & Grove Community Dr. Below is an image of the correct intersection.

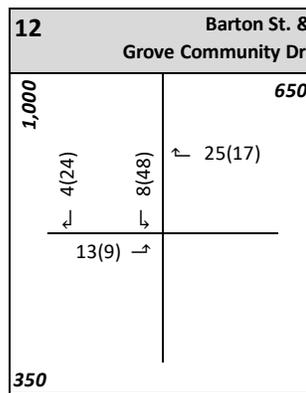


Exhibit 4-3 of the 2022 Traffic Analysis has been revised to reflect the corrected intersection diagram for Intersection #12. The analysis used the correct lane configuration and no further revisions to the 2022 Traffic Analysis are required.

COMMENT I-831.12

Table 4.15-3 provides employees estimates and refers to Appendix O as the source of the estimates. However, Appendix O refers to the March JPA as the source of the estimates and provides no indication that the jobs estimate per acre are justified in any way.

Given that a jobs estimate is a requirement to calculate the estimated VMT/employee, it is important to disclose a reproducible or citable methodology for providing a jobs estimates.

In Table 4.15-5, project VMT is estimated at 58,874 miles for home-to-work based trips for employees. It estimates the VMT/employee as 24.12 based on a non-retail employment value of 2,340, with no citable methodology for the buildout year 2045 employee rate.

¹⁰ The volumes at this location have been updated as the previous exhibit included incorrect volumes. The updated inset for intersection #24 shown above discloses the correct volumes and is included in Exhibit 3-17. The analysis used the correct volumes and no further revisions to the 2022 Traffic Analysis are required.

However, there are a large number of studies and articles indicating that warehouse jobs are extremely automatable and that autonomous vehicles (trucks and delivery) are likely to be added to the roads in the near-future, certainly at rates worth considering. The seminal work on this is 'The Future of Employment' by Frey and Osborne⁵. Automation of warehouse work is mentioned in many articles, with industry leaders such as Amazon being cited as investing large sums in automating these jobs.⁶

We believe that it is important to consider VMT/employee based on a sensitivity analysis of the possible automation of jobs that are core to the types of land-use being considered.

The following types of goods movement jobs are considered extremely susceptible to automation⁷.

- Driver/Sales workers – 98%
- Locomotive engineers – 96%
- Conveyor operators – 93%
- Industrial Truck and Tractor Operators – 93%
- Laborers and Freight Stock, and Material Movers – 85%
- Heavy and Tractor-Trail Truck Drivers – 79%
- Tank Car, Truck, and ship loaders – 72%
- Light Truck or Delivery Services Drivers – 69%
- Packers and Packagers, Hand – 38%

As one can see, almost all the key job categories in the goods movement industry are likely to be extremely susceptible to job automation. Even if only 33% of those categories actually get automated, it would still result in an enormous decrease in the number of jobs in the 2045 buildout year. Of key importance to warehouse jobs, the delivery of goods by people may be automated (heavy trucks and delivery trucks). This would result in VMT/employee estimates that would go explode – autonomous vehicles will create VMT with no employment.

Therefore, I ask that the March JPA

- 1) Justify its base jobs numbers on a per acre or citable basis.
- 2) Justify not performing a sensitivity analysis on the jobs estimates based on future automation of standard warehouse job categories.
- 3) Justify that the VMT/Employee are going to remain less than 25 miles per employee threshold of significance level in a more automated future with autonomous vehicles and trucks.

RESPONSE I-831.12

At this time, it is speculative to assume future automation and/or incorporate such unknown factors into the 2022 VMT Analysis. In general, if there is an additional level of automation that impacts onsite jobs, overall VMT would decrease compared to what has already been evaluated in the 2022 VMT Analysis. Pursuant to OPR Guidance, truck trips are not included in the 2022 VMT Analysis and future automation of such jobs would not impact the 2022 VMT Analysis. Additionally, the goal of SB 743 and VMT-based analysis is to reduce greenhouse gases. The current trend is for autonomous vehicles to be hybrid or fully electric, which supports the ultimate goal of SB 743. As such, the 2022 VMT Analysis provides a more conservative analysis, and no additional analysis is necessary.

MICHAEL MCCARTHY LETTER I-832

COMMENT I-832.7

In the draft EIR, we find most figures use the IS/NOP version of the Site Plan. Table 1 shows the entire list of figures that show a Project Site Plan and whether they used the IS/NOP Figure 4 or Draft EIR Figure 3.5 version.

RESPONSE I-832.7

As noted in Table 1 of Comment I-832.7, the exhibits in the technical studies prepared by Urban Crossroads, Inc. (Air Quality, Greenhouse Gas, Health Risk Assessment, Energy, Traffic, Vehicle Miles Traveled, and Noise Studies) have been updated to reflect the correct land use plan.

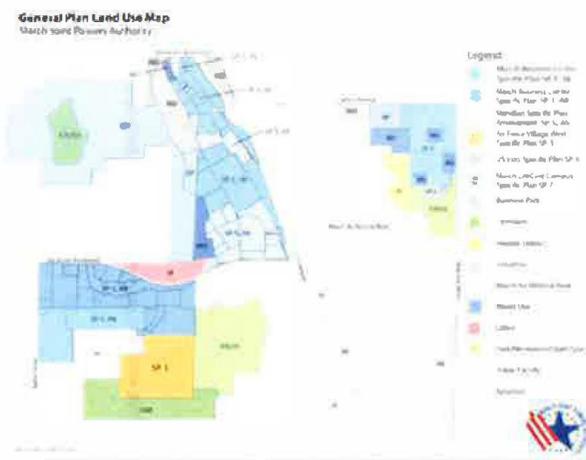
MICHAEL MCCARTHY LETTER I-834

COMMENT I-843.4

I find the geographic scope of analysis listed in Table 4-1 to be inconsistent with the definitions of geographic vicinity listed in the draft EIR.

On page 4-3, it states, 'Unless otherwise indicated in the analysis in Chapter 4 of this Draft EIR, the geographic scope used in the cumulative analysis includes the March JPA planning area.' It is obviously clear that at the March JPA planning area is not completely included in the Table 4-2 cumulative impacts project list.

Our best estimate is that the March JPA has an existing warehouse footprint (i.e., parcel size)¹ of approximately 23 million square feet, with an estimate square footage of approximately 12 million square feet. Multiple warehouse and industrial facilities within the March JPA Meridian Specific Plan SP-5, AS, Specific Plan SP-1, A6, and aviation facilities associated with commercial cargo operations and the proposed Meridian D-1 Aviation Gateway are left off the March JPA planning area cumulative impacts list. These are clearly visible in the March JPA General Plan Land Use Map.



March JPA General Plan Land Use Map - February 2023.

However, it is also clear that the 'immediate vicinity' of the Meridian West Campus Upper Plateau has far more warehouses than the March JPA planning area includes. Therefore, we request that all 'Immediate Vicinity' analyses include all warehouses and designated truck routes located within 1-mile of project specific plan area as shown in Figure 1. Thus, we request that all warehouses and truck routes within this 1-mile boundary be explicitly included in all construction phase and operational phase analyses that fit the 'Immediate Vicinity' geographic scope.

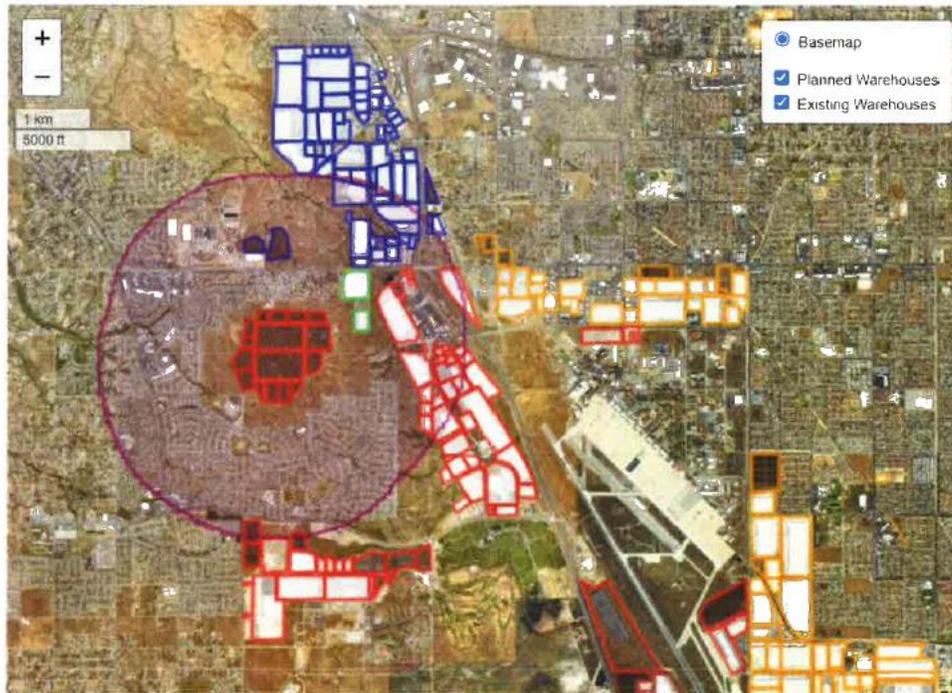


Figure 1- Map of project area, surrounded by a 1-mile buffer. Warehouse colors indicate the jurisdiction responsible for land-use authority, while the fill indicates an existing (white) or planned/approved (gray) warehouse project.

RESPONSE I-843.4

The 2022 Traffic Analysis includes existing development, including warehouses, as part of the existing conditions baseline. Refer to Response I-74.2, above, for an explanation of the selection of cumulative projects. All development projects, including the existing surrounding warehouse developments, are included in the baseline traffic counts if the developments are built and operational at the time traffic counts were collected. Future known pending/approved development projects are included in the cumulative traffic analysis for future conditions. The cumulative analysis includes known cumulative projects within a 5-mile radius of the proposed Project site.

Under the March JPA Guidelines, proposed projects in the stud area that have been submitted to March JPA for processing, but have not yet been approved, are included as a cumulative project at the discretion of the March JPA. The March JPA declined to include the Meridian D-1 Gateway Aviation project on the map or list because the D-1 project's travel patterns and traffic would not affect the proposed study area intersections. Any nominal traffic contribution to the

study area from this project and others would be represented in the 14.87% of background growth that is added to the existing baseline.

COMMENT I-843.7

Table 2- Immediate Vicinity warehouse assessor parcel numbers or project names and March JPA/City of Riverside designated Truck routes. All are within 1 mile of project specific plan area.

Jurisdiction	Warehouse APN or Roadway	Table 4-2 Designation
CalTrans	I-215 Freeway	
City of Riverside	263240047	R16
City of Riverside	263250053	R19
City of Riverside	263250075	R22
City of Riverside	263080023	R23
City of Riverside	263240049	R23
City of Riverside	Sycamore Hills Distribution Center	R9
City of Riverside	263050084	
City of Riverside	263060041	
City of Riverside	263060041	
City of Riverside	263060044	
City of Riverside	263070055	
City of Riverside	263070065	
City of Riverside	263070068	
City of Riverside	263240046	
City of Riverside	263250044	
City of Riverside	263250054	
City of Riverside	263250056	
City of Riverside	263250057	
March JPA	294040035	MJPA1
March JPA	294040037	MJPA1
March JPA	294040038	MJPA1
March JPA	297100084	MJPA1
March JPA	297110046	MJPA1
March JPA	294100045	MJPA13
March JPA	Building 1	MJPA13
March JPA	Building F & G	MJPA13
March JPA	297100095	MJPA4
March JPA	294640034	
March JPA	297230025	

March JPA	297230026	
March JPA	297230031	
March JPA	297231006	
March JPA	297231008	
March JPA	297231009	
March JPA	297231012	
March JPA	297231013	
March JPA	297231014	
March JPA	297231015	
March JPA	297231016	
March JPA	297232004	
March JPA	297232005	
March JPA	Cactus Ave	
March JPA	Meridian Parkway	
March JPA	Meridian West Building 4	
March JPA	Van Buren Blvd.	
Riverside County	297080015	RC1
Riverside County	297080016	RC1

RESPONSE I-843.7

The APNs listed on Table 2 without a designation on Table 4-3, Cumulative Development Land Use Summary, of the 2022 Traffic Analysis, have been confirmed as currently existing. The APNs currently have building structures on these sites and traffic being generated by these sites are accounted for in the baseline traffic counts that were conducted for the 2022 Traffic Analysis. Meridian West Building 4 is included as part of MJPA 1 because Building 4 is part of the Meridian West Campus development. The Cactus Avenue, Meridian Parkway, and Van Buren Boulevard projects could not be confirmed because the location is too generic to correlate with a site/project.

Jurisdiction	Warehouse APN or Roadway	Status
City of Riverside	263-050-084	Developed
City of Riverside	263-060-041	Developed
City of Riverside	263-060-044	Developed
City of Riverside	263-070-055	Developed
City of Riverside	263-070-065	Developed
City of Riverside	263-070-068	Developed
City of Riverside	263-240-046	Developed
City of Riverside	263-250-044	Developed
City of Riverside	263-250-054	Developed
City of Riverside	263-250-056	Developed
City of Riverside	263-250-057	Developed
March JPA	294-640-034	Developed
March JPA	297-230-025	Developed
March JPA	297-230-026	Developed
March JPA	297-230-031	Developed
March JPA	297-231-006	Developed
March JPA	297-231-008	Developed
March JPA	297-231-009	Developed
March JPA	297-231-012	Developed
March JPA	297-231-013	Developed
March JPA	297-231-014	Developed
March JPA	297-231-015	Developed
March JPA	297-231-016	Developed
March JPA	297-232-004	Developed
March JPA	297-232-005	Developed
March JPA	Cactus Avenue	Unconfirmed
March JPA	Meridian Parkway	Unconfirmed
March JPA	Meridian West Building 4	MJPA1
March JPA	Van Buren Boulevard	Unconfirmed

COMMENT I-843.8

In addition to immediate vicinity geographic impacts, multiple environmental resources drastically underestimated the regional impact of past, present, and probable future projects on the 215/60 Corridor area. For completeness, Table 3 shows the list of environmental resources that should be analyzed regionally.

Table 3 - Regional Analyses that should include all 10-mile warehouses and truck routes

Environmental Resource	Geographic area	List of Projects and Truck Routes
Air Quality (construction/mobile sources)	Regional	Table 4 List
Land Use and Planning	Regional	Table 4 List
Population and Housing	Regional	Table 4 List
Transportation	Regional	Table 4 List

Figure 2 helpfully identifies a 10-mile buffer region around the project boundary, although I only include Riverside County warehouses to focus on the 215/60 corridor impacts as the primary transportation and land-use bottle-neck is within the Riverside county portion.

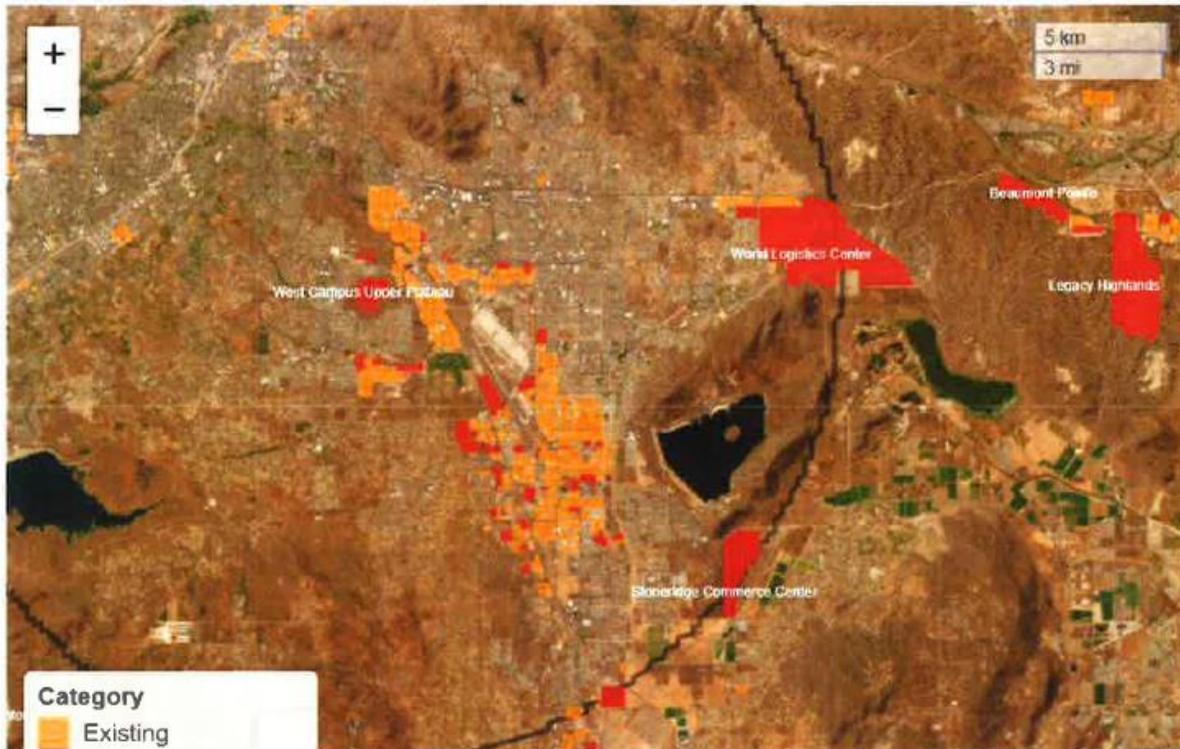


Figure 2 - 10-mile regional buffer region with warehouses (existing and planned/approved) overlaid. Existing warehouses have a white fill, while approved/planned warehouse areas are filled in gray.

The existing regional warehouse footprint of warehouses is approximately 280 million square feet. The planned and approved warehouse footprint includes another 200 million plus square feet of land, nearly doubling the existing footprint.

Of most importance, two critical projects are going to have an extremely large impact on the region - the World Logistics Center (east Moreno Valley) and the Stoneridge Commerce Center (Nuevo, unincorporated Riverside County).

The World Logistics Center is breaking ground in 2023. It will be developed in two phases over approximately 12 years and will include 40 million square feet of warehouses and over 19,000

daily truck trips when fully built out. Its environmental impact report suggested it would generate 35,000 jobs².

The Stoneridge Commerce Center has been approved by Riverside County. It is over 9.5 million square feet of warehouses and was projected to generate over 10,000 jobs³ and nearly 4,000 truck trips.

These two very large projects are projected to generate 45,000+ jobs and 23,000 daily truck trips, most of which will travel on the 215/60 corridor. While these are two of the largest projects in the region - together they account for 109 million square feet of the total footprint - they are just slightly more than 52% of the planned and approved warehouses in the 215/60 corridor within 10 miles. Another 100 million square feet of footprint is also approved. I list the projects below, along their approximate footprint for review: Our region will be adding an enormous number of warehouses to a region that is already overwhelmed by truck traffic and pollution and does not have the existing local workforce or housing to support this continued growth in industrial projects.

Table 4 provides a list of warehouses built since 2018 and planned/approved in the area along the 215/60 corridor. This is a reasonable list for a present and planned list of warehouses in the region to address for the regional environmental issues.

Table 4. *List of warehouses and warehouse complexes in the region to include in Environmental Analyses.*

Project Name or APN	Building classification	Year built	Acres	Existing or CEQA Stage	Jurisdiction
World Logistics Center	Warehouse complex	Future	2610	NOC	Moreno Valley
Stoneridge Commerce Center	Warehouse complex	Future	583	NOC	Unincorporated Riverside
Legacy Highlands Phase II	Warehouse Complex	Future	1414	NOP	Beaumont
Beaumont Pointe	Warehouse Complex	Future	259	Draft EIR	Beaumont
302050035	warehouse/dry storage	Unlisted	83	Existing	Perris
302080033	warehouse/dry storage	2021	80	Existing	Perris
Majestic Freeway Business Park	Warehouse complex	Future	68	NOP	Unincorporated Riverside
316100060	warehouse/mega	2019	63	Existing	Moreno Valley
294640034	ct-warehouse/cold storage	2019	59	Existing	March JPA
303050004	warehouse/mega	2021	55	Existing	Perris
316211002	warehouse/mega	2018	49	Existing	Moreno Valley
263021003	warehouse/mega	2019	48	Existing	Riverside
302120024	warehouse/mega	2020	47	Existing	Perris
Heacock Commerce Center	Warehouse	Future	46	NOP	Moreno Valley
263020066	warehouse/dry storage	Unlisted	45	Existing	Riverside
294110011	light industrial	2018	44	Existing	March JPA
314180030	warehouse/mega	2019	37	Existing	Perris

Duke Warehouse	Warehouse	2023	36	DEIR	Perris
295310069	warehouse/dry storage	2019	35	Existing	Unincorporated Riverside
488350060	warehouse/mega	2021	33	Existing	Moreno Valley
312250059	light industrial	2018	32	Existing	Moreno Valley
317240001	warehouses/mega	2021	32	Existing	Unincorporated Riverside
312250049	light industrial	Unlisted	29	Existing	Moreno Valley
303130040	warehouses/mega	2020	29	Existing	Perris
First March Logistics Project	Warehouse	Future	28	NOP	Perris
294070038	warehouse/dry storage	2018	27	Existing	March JPA
314310019	light industrial	2019	27	Existing	Unincorporated Riverside
294180055	warehouse/mega	2021	26	Existing	Unincorporated Riverside
294180055	warehouse/mega	2021	26	Existing	Perris
302150030	warehouse/dry storage	Unlisted	25	Existing	Perris
316211001	warehouse/mega	2018	22	Existing	Moreno Valley
314110075	light industrial	Unlisted	22	Existing	Unincorporated Riverside
263070065	light industrial	Unlisted	20	Existing	Riverside
294640001	light industrial	Unlisted	19	Existing	March JPA
485230036	warehouse/dry storage	2018	19	Existing	Moreno Valley
316180015	warehouses/dry storage	2018	19	Existing	Moreno Valley
Compass Danbe Centerpointe	Warehouse	Future	18	approved NOC	Moreno Valley
263021001	light industrial	2019	18	Existing	Riverside
297170089	warehouse/dry storage	Unlisted	18	Existing	Moreno Valley
PAMA business Park	Warehouse	Future	17	approved NOC	Moreno Valley
305100066	warehouse/dry storage	2021	17	Existing	Unincorporated Riverside
302050040	warehouse/mega	2021	17	Existing	Perris
300170009	light industrial	2021	16	Existing	Perris
300250017	warehouse/mega	2019	16	Existing	Perris
Muranaka Warehouse Project	Warehouses	Future	15	MND	Unincorporated Riverside

316200038	light industrial	Unlisted	13	Existing	Moreno Valley
297170096	warehouse/mega	2021	12	Existing	Moreno Valley
297170096	warehouse/dry storage	2021	12	Existing	Moreno Valley
263050080	light industrial	Unlisted	11	Existing	Riverside
297170071	light industrial	Unlisted	11	Existing	Moreno Valley
316190053	warehouse/mega	2019	11	Existing	Moreno Valley
302100013	warehouse/dry storage	2020	11	Existing	Perris
302130042	warehouse/dry storage	2019	11	Existing	Perris
263320027	light industrial	Unlisted	10	Existing	Riverside
Meridian D1 Aviation Gateway	Warehouse/aviation	Future	10	pending EIR	March JPA
305030058	light industrial	Unlisted	10	Existing	Perris
297170093	warehouse/mega	2020	9	Existing	Moreno Valley
316100051	light industrial	2021	9	Existing	Moreno Valley
297170093	warehouse/mega	2020	9	Existing	Moreno Valley
316200043	light industrial	Unlisted	9	Existing	Moreno Valley
302080006	warehouse/dry storage	2020	9	Existing	Perris
Edgemont Commerce Center	Warehouse	Future	8	pending EIR	Moreno Valley
Moreno Valley Business Center	Warehouse	Future	8	approved NOC	Moreno Valley
297170086	light industrial	Unlisted	8	Existing	Moreno Valley
302120025	warehouse/dry storage	2020	8	Existing	Perris
263280065	light industrial	Unlisted	7	Existing	Riverside
263070068	light industrial	Unlisted	7	Existing	Riverside
291070036	warehouse/dry storage	Unlisted	6	Existing	Riverside
297232005	light industrial	Unlisted	6	Existing	March JPA
297230026	light industrial	Unlisted	6	Existing	March JPA
263060044	light industrial	2018	6	Existing	Riverside
263290072	light industrial	Unlisted	5	Existing	Riverside
291070038	light industrial	Unlisted	5	Existing	Riverside
294650001	warehouse/dry storage	2019	5	Existing	March JPA
291420008	light industrial	Unlisted	4	Existing	Riverside
Heacock and Krameria	Warehouse	Future	4	Plan check	Moreno Valley

291420023	warehouse/dry storage	Unlisted	2	Existing	Riverside
297270008	warehouse/dry storage	2019	2	Existing	March JPA
294070040	warehouse/dry storage	2019	1	Existing	March JPA
294070041	warehouse/dry storage	2019	1	Existing	March JPA
297270007	warehouse/dry storage	2019	1	Existing	March JPA
297270010	warehouse/dry storage	2019	1	Existing	March JPA

In total, the existing and approved acreage of warehouses built and approved in the last 5 years has been enormous in the region. As a result, regional analyses of warehouses, traffic, jobs, population, and air quality that are not current will drastically underestimate the regional impacts of warehouses on the 215/60 corridor. This table should be adopted and included in a comprehensive cumulative impacts analysis for the regional air quality, jobs, population, and transportation sections.

I leave you with one last map showing the 15-mile regional buffer of warehouses within our region. It includes some of the other mega-projects just at or beyond the regional boundary defined in the Transportation analysis section. Figure 3 shows the whole Inland Empire, a 15-mile buffer boundary around the project, and a few labeled mega-warehouse complexes that have been approved or are in planning stages ranging from NOP to draft EIR. Key complexes not mentioned yet include the Serrano Commerce Center, West Valley Logistics Center, Speedway Commerce Center, Airport Gateway, Bloomington Business Park, South Ontario Logistics Center, Merrill Commerce Center, and the Renaissance Ranch Commerce Center, and the South Perris Industrial Center.

I made these maps to provide a vision of what the future of our region looks like. The future is an unlivable wasteland of warehouse complexes - squeezing out the residents of the region to make room for the titans of eCommerce to make a few more \$\$\$\$. It would be awesome if our decision makers took a long hard look at our region and thought about how the quality of life looks in 10-20 years when all these warehouses will be fully built out. I don't think this looks like a place people will choose to come to unless they have no better options. I think better planning is possible, but it requires decision-makers to put quality of life issues over easy short-term profits and tax revenue.

To put this in proper perspective, it needs to be explicitly addressed in the EIR and these project lists are 100% consistent with the geographic scope listed in Section 4.0. Please add these projects and do a truly comprehensive analysis of the regional impacts of warehouse growth.

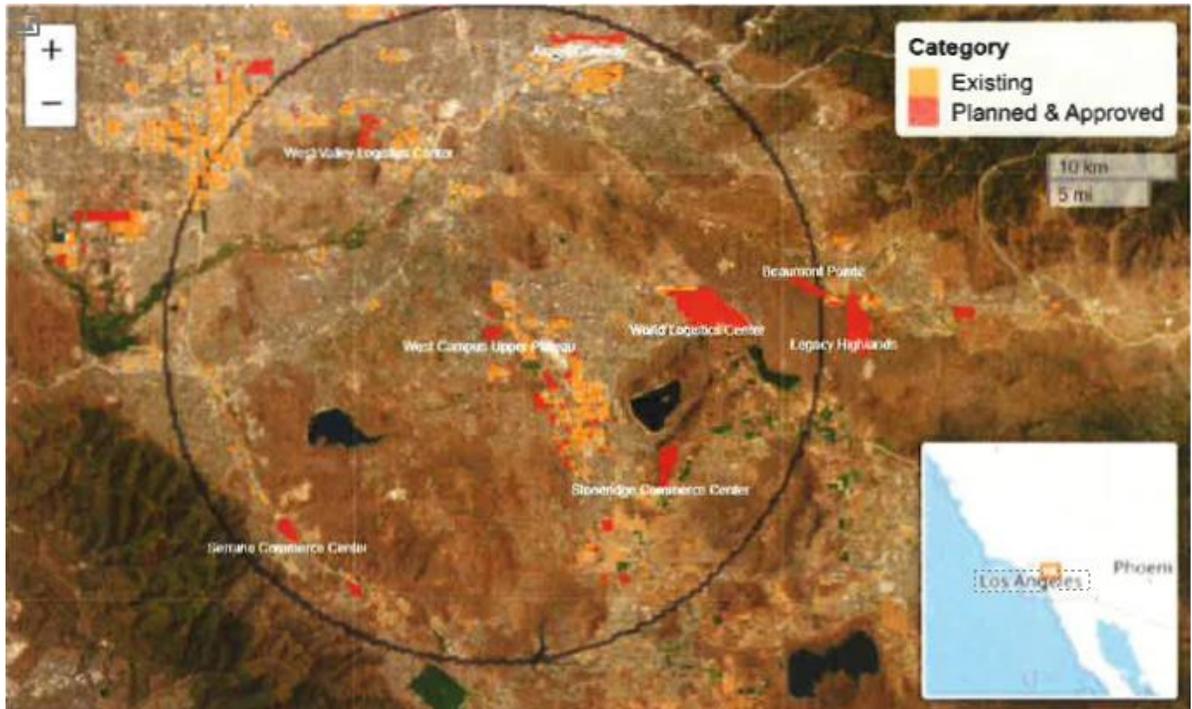


Figure 3 - Existing and planned/approved warehouse development in a 15-mile ring (black circle) around the West Campus Project.

RESPONSE I-843.8

Refer to Response I-74.2, above, for an explanation of the selection process for cumulative projects. The traffic generated by the existing development projects are already accounted for in the existing baseline traffic counts. See also Response I-834.4, above.

If you have any questions or comments, Charlene So can be reached at cso@urbanxroads.com.

