9 Responses to Comments

9.1 Topical Responses

9.1.1 Topical Response 1 - Aesthetics

In response to various comments received on the Draft EIR, this topical response addresses commonly raised issues regarding aesthetics so as not to be repeated in each individual response, but rather cross-referenced in individual letter responses where applicable. The topical response includes a summary of the aesthetics analysis in the Draft EIR and provides further information in response to comments raised on the analyses included in Section 4.1, Aesthetics, of the Draft EIR.

EIR Analysis

The aesthetics analysis in the EIR describes the existing visual character of the Project site and its surroundings, identifies regulatory requirements, evaluates potential impacts, and identifies mitigation measures associated with implementation of the Project, as applicable. The aesthetic impacts of the Project's buildout scenario are discussed in detail in Section 4.1, Aesthetics, of the EIR. As explained in the EIR, in addition to the proposed Specific Plan Area, the Project also includes the establishment of a 445.43-acre Conservation Easement, which primarily consists of undeveloped open space. No new development would occur within the Conservation Easement, and it would provide a buffer of at least 300 feet of open space on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.

The EIR identified 16 aesthetic project design features (PDF-AES) that are incorporated in the Specific Plan for the proposed Project. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Using established thresholds based on the 2022 March JPA CEQA Guidelines, Section 4.1.5, Impacts Analysis, in the EIR separately evaluated each component of the proposed Project: the Campus Development, the Park, Infrastructure Improvements, and the Conservation Easement. The Project would result in less than significant impacts associated with the degradation of existing visual character. With implementation of mitigation measure **MM-AES-1**, which requires large construction equipment and vehicles to be screened from public view when not in use, the Project would also result in less than significant impacts related to effects upon a scenic vista. With implementation of **MM-AES-2**, which requires a photometric study as part of the building permit application, and **MM-AES-3**, which requires use of anti-reflective coatings on PV panels, the Project would also result in less than significant impacts related to the creation of a new source of light and/or glare. Further, the Project would not result in cumulatively considerable aesthetics impacts.

Existing Visual Character and Quality and Views/Viewpoints

A number of comments expressed concern about changes to existing visual character from the viewpoints included in the Draft EIR. As explained in the Draft EIR, the proposed Specific Plan Area covers a previously developed area which is currently developed with a non-operational water tower, electrical poles, dirt and partially paved access roads, and 14 bunkers and related structures associated with the prior operations for munitions storage by the Air Force. The remainder of the Project site, which is proposed as the Project's Conservation Easement, is mostly undeveloped open space. The nearest residential area is a single-family residential development within the County of Riverside and City of Riverside and is approximately 300 feet north of the proposed Specific Plan Area.
As shown in Figure 4.1-1, March JPA General Plan – Scenic and Viewshed Areas, of the Draft EIR, the Project site is not a scenic vista. The Project area and its immediate surroundings are mostly flat; however, the San Bernardino

Mountain Range and its foothills are approximately 20 miles to the northeast, and Mount San Jacinto is located to the east of the Project site. Distant views of this terrain are available from the Project site and the Project area. Views toward the Project site and to the mountainous terrain in the broader surrounding area are available from public roadways in the Orangecrest neighborhood (Barton Drive and Dayton Street) and along Camino Del Sol, near Alessandro Boulevard.

As such, the aesthetics analysis identified public viewpoints that warrant detailed consideration in preparation of the Specific Plan. The EIR analyzed these five viewpoints in detail and included photosimulations from each viewpoint in the aesthetics analysis. These viewpoints are:

1. Looking south towards the Project site along Camino Del Sol, near East Alessandro Boulevard;
2. Looking southeast towards the Project site along the corner of Saltcoats Drive and Greenock Way at the terminus of Barton Road;
3. Looking northeast towards the Project site in the Orangecrest neighborhood at the intersection of Deercreek Drive and Grove Community Drive, near the Grove Community Church;
4. Looking north towards the Project site in the Orangecrest neighborhood, along the eastern end of Dayton Street; and
5. Looking northwest towards the Project site in the Orangecrest neighborhood along the western end of Iris Canyon Road.

The five viewpoints identified for the visual analysis are shown in Figure 4.1-2, Key Points Viewpoint Map, of the Draft EIR. The intent of Figure 4.1-2 is to show both the location and elevation from which each of the five existing condition photographs was taken and not to serve as a specific site plan or topographic plan. The Specific Plan Area and the Conservation Easement are shown for informational purposes so that the reader can understand what portion of the Project each viewpoint is capturing. Information about grades and sightlines are included in Appendix B and discussed further below.

Photosimulations

A number of comments expressed concern about the photosimulations prepared for the Project. As explained in the Draft EIR, to visually identify anticipated changes from public viewpoints surrounding the Campus Development, and to specifically identify if the Campus Development would have a substantial adverse effect on a scenic vista, visual simulations were prepared from the five key vantage points discussed above. To prepare the photosimulations, the five viewpoint photographs were used as a base layer in AutoCAD, and the Project buildout scenario was overlayed, including setbacks, height, materials, color palettes, and landscaping consistent with the plant palette and Design Guidelines in the proposed Specific Plan. For ornamental and screening landscaping within the Development Area, a 10-year growth factor was applied to each plant species. Additionally, the photosimulations accounted for the proposed grades within the Campus Development. The five photosimulations are included as Figures 4.1-3 through 4.1-7 in Section 4.1 of the EIR.

As explained in the Draft EIR, the proposed Specific Plan would establish design standards for future development within the Project site. As such, renderings of buildings under the Project buildout scenario used the materials and color palette specified in Chapter 4, Design Guidelines, of the proposed West Campus Upper Plateau Specific Plan, consistent with PDF-AES-1, which requires development to comply with the Specific Plan Design Standards which dictate building heights, setbacks, color palettes and materials intended to minimize visual obstructions and maximize visual compatibility. Specifically, and as explained in the aesthetics analysis, the Campus Development would be characterized by simple and distinct cubic masses with interlocking wall planes, colors, and materials. Exterior building colors would be light and gray tones with use of stone, glass windows, or steel materials. These

design elements would be compatible in character, massing, and materials to existing similar development in the vicinity. Furthermore, building materials used on building exteriors would be similar to building materials incorporated into existing development in the Project vicinity. As explained in the Draft EIR, the proposed Specific Plan would require that future development be similar in design and scale to the adjacent industrial development along the I-215 corridor by incorporating similar architectural design and accents displayed by existing development and through the use of similar building materials.

For reference, the photosimulation included as Figure 4.1-3, Viewpoint No. 1, has been updated. The Figure 4.1-3 included in the Draft EIR utilized a maximum building height of 50 feet as well as an earlier version of the Specific Plan Area site plan where four larger business park buildings would be constructed instead of seven smaller business park buildings. Figure 4.1-3 has been revised in the Final EIR to reflect a 45-foot building height and the construction of smaller-scale buildings under the Project buildout scenario. The updated Figure 4.1-3 is provided in Section 4.1, Aesthetics, of the Final EIR. These changes do not affect the conclusions in the Draft EIR, and impacts would remain less than significant.

Sight Line Sections

A number of comments questioned the relevance of Appendix B to the Draft EIR. Section 4.1, Aesthetics, and Appendix B, Meridian Upper Plateau Sight Line Sections, describe sight line sections that show existing and proposed grades at five sections through the Project site to match the locations of the viewpoints described above. These sections were prepared to demonstrate the general scope of grading required for the Project as well as the elevations of the Specific Plan Area as they relate to the Conservation Easement and neighboring off-site residential areas. They show the topography of the Project at these locations under existing and proposed conditions.

Evaluation of the Project's Aesthetic Impacts on Existing Visual Character and Quality

While some comments questioned the adequacy of the evaluation of the Project's aesthetic impacts, the aesthetics analysis in the EIR is based on established thresholds in compliance with CEQA and based on the 2022 March JPA CEQA Guidelines. Under Threshold AES-2, the Draft EIR analyzed the potential for implementation of the Project buildout scenario to degrade the existing visual character or quality of public views of the site and its surroundings and concluded impacts would be less than significant. Regarding Viewpoint No. 1, the Draft EIR stated that, setbacks, the Conservation Easement, compliance with PDF-AES-1, and landscaping would soften the changes in the view by partially screening Campus Development. The revised photosimulation in Figure 4.1-3 discussed above shows reduced visual impacts from Viewpoint No. 1 with smaller, and shorter, buildings. For Viewpoint No. 2, the Conservation Easement would act as a visual buffer and shrub and tree landscaping would partially screen the Project buildout scenario's Mixed Use buildings. Viewpoint No. 5 would not have any views of the proposed Project. The Draft EIR referenced discussion under Threshold AES-1 for Viewpoints No. 3 and 4.

To provide additional clarification regarding the potential visual impacts of the Project buildout scenario, additional discussion regarding Viewpoint Nos. 3 and 4 has been added to the aesthetics analysis under Threshold AES-2 in Section 4.1, Aesthetics, of the Final EIR. As explained therein, while the existing visual character would change from both viewpoints, setbacks, the Conservation Easement, compliance with **PDF-AES-1**, and landscaping would soften the changes in the view by partially screening Campus Development and retaining views of vegetation and the San Bernardino Mountain foothills. This additional discussion does not affect the conclusions in the Draft EIR, and impacts would remain less than significant.

As explained in the aesthetics analysis in Section 4.1, Aesthetics, the Campus Development would not fully conceal and/or obstruct scenic features from the view of motorists and pedestrians traveling in the Project vicinity, and it would not physically alter or otherwise modify the views of the local hills and mountainous terrain. The bulk and

scale of the Campus Development would be consistent with the surrounding area, the Campus Development would comply with **PDF-AES-1**, and a Conservation Easement would be established around the Specific Plan Area. In addition, setbacks and landscaping would soften the changes in view by partially screening the Campus Development and retaining views of open space and vegetation. As such, potential aesthetic impacts to scenic vistas would be minimized and the Campus Development would not degrade the existing visual character of the Project site. This substantial evidence supports the Draft EIR's conclusion that potential aesthetic impacts to scenic vistas and visual character associated with the Project were determined to be less than significant. The additions and modifications to the text in the EIR presented here do not change the analysis or conclusions in the Draft EIR related to aesthetics. These merely add detail and clarification about the visual impacts of the Project buildout scenario and do not constitute significant new information added to the EIR such that recirculation of the EIR under CEQA Guidelines Section 15088.5 would be required.

9.1.2 Topical Response 2 – Air Quality

Revisions to the EIR Air Quality and Health Risk Assessment Analysis

The Draft EIR was published on January 9, 2023. In response to comments on the Draft EIR, the air quality and GHG project design features and mitigation measures were revised and expanded to incorporate additional feasible mitigation. This included converting project design features PDF-AQ-1 (Tier 4 Final Construction Equipment), PDF-AQ-2 (Construction Budget), and PDF-AQ-3 (Future Site Plans) to mitigation measures.

The Project Air Quality Impact Analysis (AQIA) and Project Health Risk Assessment (HRA) were revised to incorporate, and quantify as applicable, the revised and expanded mitigation measures and, also in response to comments, model emergency generators on each of the 19 Industrial, Business Park and Mixed Use parcels. As part of the Recirculated Draft EIR revisions released for public review on December 2, 2023, Recirculated Section 4.2, Air Quality, the Revised Project AQIA and Revised Project HRA disclosed construction and operational air emission and health risk for the unmitigated and mitigated scenarios. In addition to this updated modeling, Recirculated Section 4.2, Air Quality, included additional information and analysis of potential cumulative impacts. As such, where appropriate, response to comments on the Draft EIR refer to the Recirculated EIR sections.

Additional public comments were received on the Recirculated Draft EIR sections and appendices. In response to these comments, the Project AQIA and Project HRA were updated to clarify the modeled distances of sensitive receptors and Project construction. With regard to operations, the Project HRA modeling was updated to analyze seven business park parcels at the northern end of the Specific Plan Area, for a total of 10 business park buildings. This update resulted in a reduction in health risk in the unmitigated operational scenario and no change in the mitigated operational scenario. The Project HRA is attached to this Final EIR as Appendix C-2. Comments on the Recirculated Draft EIR sections related to air quality impacts are responded to in this Final EIR.

The remainder of this topical response addresses comments raised about the Project's efforts to reduce air quality impacts in relation to the following California Attorney General advice, regional plans, and mitigation incorporated into other projects:

- Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act – Office of the California Attorney General, September 2022
- South Coast Air Quality Management District (SCAQMD) 2022 Air Quality Management Plan
- U.S. EPA – Mobile Source Pollution: Environmental Justice and Transportation
- World Logistics Center Settlement Agreement Air Quality Measures
- Centerpoint Properties Air Quality Conditions of Approval
- Stockton Mariposa Industrial Complex Air Quality Mitigation Measures
- City of Fontana Ordinance 1891 Air Quality Measures

Project Consistency Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act – Office of the California Attorney General, September 2022

Several comments questioned the Project's consistency with the Office of the California Attorney General guidance entitled "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" (September 2022). The following table identifies the best practices and mitigation measures identified in the guidance and a consistency analysis to determine whether or not, and how, the Project would be consistent with each of the best practices and mitigation measures.

AG's Warehouse Best Practices	Proposed Project
Air Quality and Greenhouse Gas Emissions Mitigation - Construction	
Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.	**Consistent.** **MM-AQ-1** requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. **MM-AQ-3** requires the construction contractor to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible.
Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.	**Consistent.** **MM-AQ-2** prohibits the operating hours of construction equipment to exceed 8 hours and requires the construction contractor to submit a biweekly log to March JPA to ensure compliance.
Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.	**Consistent.** **MM-AQ-3** requires the construction contractor to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible, and to designate an area where such equipment can be charged. **MM-AQ-3** further prohibits the use of diesel-powered portable generators, unless necessary due to emergency situations or constrained supply.
Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.	**Consistent.** **MM-AQ-3** requires the designation of an area where electric-powered construction vehicles and equipment can be charged.
Limiting the amount of daily grading disturbance area.	**Consistent.** **MM-AQ-2** limits amount of daily grading as follows: During Phase 1, areas of active ground disturbance shall not exceed a maximum of 20 acres per day for Mass Grading and 20 acres per day for Blasting & Rock Handling. During Phase 2, the area of active ground disturbance shall not exceed a maximum of 20 acres per day for Remedial Grading. The construction contractor shall submit a grading log to the March JPA every two weeks documenting acreage graded or equivalent cubic yardage to ensure compliance.
Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.	**Not Applicable.** The Project would have a less than significant air quality construction impact with the implementation of **MM-AQ-1** through **MM-AQ-4**. However, to further reduce the Project's air quality construction impacts, **MM-AQ-3** prohibits grading on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the project area (Source Receptor Area 23).
Forbidding idling of heavy equipment for more than three minutes.	**Consistent.** **MM-AQ-3** prohibits construction equipment idling longer than 3 minutes.
Keeping on site and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.	**Consistent.** **MM-AQ-2** requires the construction contractor to submit biweekly construction equipment hours log to the March JPA. In the event alternate equipment is required, the applicant shall provide documentation demonstrating equivalent or reduced

AG's Warehouse Best Practices	Proposed Project
	emissions based on horsepower and hours of operation. **MM-AQ-3** requires all construction equipment to be tuned and maintained in accordance with the manufacturer's specifications, with maintenance records on site and available to regulatory authorities upon request.
Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.	**Consistent.** In addition to the biweekly construction equipment hours log and grading log required by **MM-AQ-2**, March JPA's general practice is to conduct regular on-site inspections during construction.
Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.	**Consistent. MM-AQ-4** requires that, prior to issuance of building permits, the developer's construction plans shall ensure the Project will utilize "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the Applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.
Providing information on transit and ridesharing programs and services to construction employees.	**Consistent. MM-AQ-3** requires the construction contractor to provide transit and ridesharing information to on-site construction workers.
Providing meal options on site or shuttles between the facility and nearby meal destinations for construction employees.	**Consistent. MM-AQ-3** requires the construction contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service.
Air Quality and Greenhouse Gas Emissions Mitigation - Operation	
Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.	**Consistent. MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.	**Consistent. MM-AQ-18** requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable.
Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.	**Consistent. MM-AQ-20** requires industrial tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31,

AG's Warehouse Best Practices	Proposed Project
	2030 or when feasible for the intended application, whichever date is later.
Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.	**Consistent.** MM-AQ-17 limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use.
Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.	**Consistent.** MM-AQ-17 requires legible, durable, weather-proof signs placed at truck access gates, loading docks, and truck parking areas that identify: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than three (3) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager, South Coast Air Quality Management District and the California Air Resources Board to report violations. One six square foot sign providing this information shall be located on the building between every two dock-high doors and the sign shall be posted in highly visible locations at the entrance gates, semi parking areas, and trailer parking locations.
Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.	**Consistent.** MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.	**Consistent.** MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.	**Consistent.** PDF-GHG-1 requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. MM-AQ-11 requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.
Running conduit to designated locations for future electric truck charging stations.	**Consistent.** PDF-GHG-1 requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.
Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the	**Consistent.** MM-AQ-8 requires that all TRU loading docks provide electrical hookups.

AG's Warehouse Best Practices	Proposed Project
property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.	
Oversizing electrical rooms by 25% or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.	**Consistent. MM-AQ-11** requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available.
Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)	**Consistent. MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code, which provides charging stations in excess of 10% of employee parking spaces.
Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.	**Consistent. MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code, which provides additional EV capable parking sites.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.	**Not Applicable.** Recirculated Section 4.2, Air Quality and Appendix C-2 assessed the Project's health risks and determined the Project would result in less than significant human health and cancer risks.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.	**Not Applicable.** Recirculated Section 4.2, Air Quality and Appendix C-2 assessed the Project's health risks and determined the Project would result in less than significant human health and cancer risks.
Requiring all stand-by emergency generators to be powered by a non-diesel fuel.	**Consistent. MM-AQ-24** prohibits the use of diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.

AG's Warehouse Best Practices	Proposed Project
Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.	**Consistent. MM-AQ-22** requires the facility operator to provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.	**Consistent.** Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, **MM-AQ-21** requires each facility to implement or join a transportation demand management program, which would include: • Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees. • Create and maintain a "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work. • Inform employees of public transit and commuting services available to them (e.g., social media, signage). • Provide on-site transit pass sales and discounted transit passes. • Guarantee a ride home. • Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees. • Designating areas for employee pickup and drop-off. • Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.
Meeting CALGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.	**Consistent. MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. The Project will comply with the CALGreen Code green building standards, as applicable.
Designing to LEED green building certification standards.	**Consistent. MM-AQ-6** requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent, at a minimum.
Providing meal options on site or shuttles between the facility and nearby meal destinations.	**Consistent.** Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, **MM-AQ-21** requires each facility to implement a transportation demand management

AG's Warehouse Best Practices	Proposed Project
	program, which would include offering shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees.
Posting signs at every truck exit driveway providing directional information to the truck route.	**Consistent. MM-AQ-15** requires signs clearly identifying the approved truck routes installed along the truck routes to and from the project site and within the project site.
Improving and maintaining vegetation and tree canopy for residents in and around the project area.	**Consistent.** Section 3.5.2 of the proposed Specific Plan requires a 15-foot landscaped setback, measured from the Landscaping and Lighting Maintenance District (LLMD) or the public right-of-way, will be required for all front and side yards adjacent to public streets. Section 4.5 of the proposed Specific Plan outlines the Landscape Design Guidelines, including streetscape landscaping comprised of a combination of evergreen and deciduous trees, low shrubs, and masses of groundcovers to create a visually pleasing experience for pedestrians and passing motorists.
Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.	**Consistent. MM-AQ-21** requires the provision of information to employees and truck drivers as appropriate: • Building energy efficiency, solid waste reduction, recycling, and water conservation. • Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting. • Participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies. • Health effects of diesel particulates, state regulations limiting truck idling time, and the benefits of minimized idling. • The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity. • Efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.	**Consistent. MM-AQ-20** encourages tenants to become SmartWay partners, if eligible. **MM-AQ-8** requires all loading docks to be compatible with SmartWay trucks.
Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.	**Consistent. MM-AQ-19** requires tenants be provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.

Project Consistency with SCAQMD 2022 Air Quality Management Plan

Several comments questioned the Project's consistency with the SCAQMD 2022 Air Quality Management Plan. The following table identifies the components of the SCAQMD 2022 Air Quality Management Plan and provides a consistency analysis to determine whether or not, and how, the Project would be consistent with each component of the SCAQMD 2022 Air Quality Management Plan.

SCAQMD 2022 AQMP	Proposed Project
Appendix IV-A – Stationary and Mobile Source Control Measures	
C-CMB-01: Emissions Reductions From Replacement With Zero Emission or Low NOx Appliances – Commercial Water Heating	**Consistent. MM-GHG-4** requires installation of water heaters with an energy factor of .92 or higher.
C-CMB-02: Emissions Reductions From Replacement With Zero Emission or Low NOx Appliances – Commercial Space Heating	**Consistent. MM-GHG-4** requires use of heating, ventilation, and air conditioning (HVAC) equipment with a season energy efficiency ratio (SEER) of 14 or higher and energy efficiency ratio [EER] 14/78% annual fuel utilization efficiency [AFUE] or 8 heating seasonal performance factor [HSPF]
C-CMB-04: Emission Reductions from Small Internal Combustion Engines	**Consistent. MM-AQ-14** requires use of electric or battery-operated equipment for landscape maintenance. **MM-AQ-18** requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable.
C-CMB-05: NOx Reductions from Small Miscellaneous Commercial Combustion Equipment (Non-permitted)	**Consistent. MM-AQ-14** requires use of electric or battery-operated equipment for landscape maintenance. **MM-AQ-18** requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable.
L-CMB-02: Reductions from Boilers and Process Heaters (Permitted)	**Consistent. MM-GHG-4** requires installation of water heaters with an energy factor of .92 or higher.
L-CMB-03: NOx Reductions from Permitted Non-Emergency Internal Combustion Engines	**Consistent. MM-AQ-24** prohibits the use of diesel back-up generators, unless absolutely necessary. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.
L-CMB-04: Emission Reductions from Emergency Standby Engines (Permitted)	**Consistent. MM-AQ-24** prohibits the use of diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions.

SCAQMD 2022 AQMP	Proposed Project
CTS-01: Further Emission Reductions from Coatings, Solvents, Adhesives, and Lubricants (VOCs)	**Consistent. MM-AQ-4** requires that, prior to issuance of building permits, the developer's construction plans shall ensure the Project will utilize "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the Applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.
MOB-03: Emission Reductions at Warehouse Distribution Centers	**Consistent. MM-AQ-1, PDF-GHG-1, MM-AQ-1 through MM-AQ-27, and MM-GHG-1 through MM-GHG-12** will reduce emissions from industrial uses at the Project site.
MOB-05: Accelerated Retirement of Older Light-Duty and Medium Duty Vehicles	**Consistent. MM-AQ-20** requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later.
MOB-06: Accelerated Retirement of Older On-Road Heavy-Duty Vehicles	**Consistent. MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
MOB-08: Small Off-Road Engine Equipment Exchange Program	**Consistent. MM-AQ-3** requires the construction contractor to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible, and to designate an area where such equipment can be charged. **MM-AQ-3** further prohibits the use of diesel-powered portable generators, unless necessary due to emergency situations or constrained supply.
MOB-14: Rule 2202 – On-Road Motor Vehicle Mitigation Options	**Consistent.** Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, **MM-AQ-21** requires each facility to implement or join a transportation demand management program, which would include: • Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees. • Create and maintain a "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work.

SCAQMD 2022 AQMP	Proposed Project
	• Inform employees of public transit and commuting services available to them (e.g., social media, signage). • Provide on-site transit pass sales and discounted transit passes. • Guarantee a ride home. • Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees. • Designating areas for employee pickup and drop-off. • Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.
MOB-15: Zero Emission Infrastructure for Mobile Sources	**Consistent.** **MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. **PDF-GHG-1** requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. **MM-AQ-11** requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.
Appendix IV-B – CARB's Strategy for South Coast	
Advanced Clean Fleets Regulation	**Consistent.** **MM-AQ-20** requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later.
Zero-Emissions Trucks Measure	**Consistent.** **MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.

SCAQMD 2022 AQMP	Proposed Project
Transportation Refrigeration Unit Regulation	**Consistent.** MM-AQ-8 requires that all TRU loading docks provide electrical hookups.
Cargo Handling Equipment	**Consistent.** MM-AQ-18 requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable.
Zero-Emission Standard for Space and Water Heaters	**Consistent.** MM-GHG-4 requires installation of water heaters with an energy factor of .92 or higher. MM-GHG-4 requires use of heating, ventilation, and air conditioning (HVAC) equipment with a season energy efficiency ratio (SEER) of 14 or higher and energy efficiency ratio [EER] 14/78% annual fuel utilization efficiency [AFUE] or 8 heating seasonal performance factor [HSPF].
On-Road Heavy-Duty Vehicle Low-NOx Engine Standards	**Consistent.** MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
On-Road Heavy Duty Vehicle Zero-Emissions Requirements	**Consistent.** MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
Off-Road Equipment Zero-Emission Standards Where Feasible	**Consistent.** MM-AQ-1 requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. MM-AQ-3 requires the construction contractor to use heavy-duty hauling trucks that are model year 2014 or later and to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible. MM-AQ-3 further requires the construction contractor to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible, and to designate an area where electric-powered construction vehicles and equipment can be charged.
Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measures	
Measure 3.1 – Commute Solutions: The federal Commuter Choice Program provides for benefits that employers can offer to employees to commute to work by methods other than driving alone.	**Consistent.** Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, MM-AQ-21 requires each facility to implement or join a transportation demand management program, which would include:

SCAQMD 2022 AQMP	Proposed Project
	• Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees. • Create and maintain a "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work. • Inform employees of public transit and commuting services available to them (e.g., social media, signage). • Provide on-site transit pass sales and discounted transit passes. • Guarantee a ride home. • Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees. • Designating areas for employee pickup and drop-off. • Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.
Measure 3.3 – Employer Rideshare Program Incentives: Employer rideshare incentives and introduction of strategies designed to reduce single occupant vehicle trips. Implementation includes information systems and marketing. Examples include: employee awareness campaigns, Transportation Management Associations (TMA) membership, alternative work hours, and financial incentives.	**Consistent. See MM-AQ-21** discussion, above.
Measure 3.5 – Preferential parking for carpools and vanpools	**Consistent. See MM-AQ-21** discussion, above.
Measure 3.9 – Encourage regulated employers to subsidize the cost of transit for employees	**Consistent. See MM-AQ-21** discussion, above.
Measure 8.8: Guaranteed ride home	**Consistent. See MM-AQ-21** discussion, above.
Measure 9.5: Encourage bicycle travel	**Consistent. See MM-AQ-21** discussion, above.
Measure 10.1: Bike racks at work sites	**Consistent. See MM-AQ-21** discussion, above.
Measure 10.8: Bicycle lanes on arterial and frontage roads.	**Consistent.** Project includes bicycle lanes as part of all Project streets.
Measure 11.2: Encourage limitations on vehicle idling	**Consistent. MM-AQ-17** limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use.

Project Consistency with U.S. EPA – Mobile Source Pollution: Environmental Justice and Transportation

Several comments questioned the Project's consistency with the EPA's Mobile Source Pollution: Environmental Justice and Transportation guidance. Additionally, comments were received about the environmental justice

impacts on sensitive communities surrounding the Project site. In response to these comments, the following table identifies programs within EPA's Mobile Source Pollution: Environmental Justice and Transportation guidance and provides a consistency analysis evaluating if, and how, the Project is consistent with the programs.

EPA Program	Proposed Project
New Standards for Medium- and Heavy-Duty Trucks	
"Clean Trucks Plan": Setting more stringent nitrogen oxide (NOx) standards for heavy duty trucks beginning in model year (MY) 2027.	**Consistent. MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
"Clean Trucks Plan": Setting more stringent emissions standards for medium-duty commercial vehicles for MY 2027 and later. This category of vehicles includes many "last mile" delivery vehicles which deliver products to people's doorsteps every day across the country, and which are rapidly electrifying. These new standards are being proposed in combination with new multipollutant standards for light-duty vehicles for MY 2027 and beyond.	**Consistent. MM-AQ-20** requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later.
"Clean Trucks Plan": Setting "Phase 3" Greenhouse Gas standards for heavy-duty vehicles beginning as soon as MY 2027 that are significantly stronger than the existing Phase 2 Greenhouse Gas standards.	**Consistent. MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
Emissions from Diesel Vehicles	
Diesel Emissions Reduction Act (DERA) Program funds projects that protect human health and improve air quality by reducing harmful emissions from diesel engines. DERA targets older, dirtier diesel vehicles that lack modern emission control systems to be replaced with new diesel, alt-fuel, and zero emissions vehicles, or upgraded with emission control systems and idle reduction technologies.	**Consistent. MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. **MM-AQ-17** limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use. **MM-AQ-19** requires tenants be provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
EPA's Partnerships with State and Local Agencies on Reducing Mobile Source Air Pollution	
EPA provides guidance on control measures that result in emissions reductions that may be applied in Clean Air Act-required state implementation plans (SIPs) and	**Consistent. MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall

EPA Program	Proposed Project
in regional emissions analyses for transportation conformity determinations. For example, EPA has provided guidance on quantifying emissions reductions from measures to replace or retrofit diesel powered vehicle and nonroad equipment.	expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. **MM-AQ-19** requires tenants be provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
EPA's Partnerships with Federal Agencies on Truck Electrification	
EPA is working closely with the Joint Office of Energy and Transportation on building support for greater application of electric vehicle technologies.	**Consistent.** **MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. **PDF-GHG-1** requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. **MM-AQ-11** requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. **MM-AQ-13** requires electrical service in the vicinity of landscaped areas or charging stations in the buildings. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.
Emissions from Nonroad Sectors	
EPA has adopted emission standards for all types of nonroad engines, equipment, and vehicles.	**Consistent.** During construction**, MM-AQ-1** requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. **MM-AQ-3** requires the construction contractor to use heavy-duty hauling trucks that are model year 2014 or later, to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible and to designate an area where such equipment and electric vehicles can be charged. **MM-AQ-3** further prohibits the use of diesel-powered portable generators, unless necessary due to emergency situations or constrained supply. During operations, **MM-AQ-18** requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable. **MM-AQ-14** requires use of electric or battery-operated equipment for landscape maintenance. **MM-AQ-24** prohibits the use of diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission

EPA Program	Proposed Project
	standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.

Project Consistency with the World Logistics Center Settlement Agreement Air Quality Measures

Comments were received requesting that all air quality mitigation measures included in the World Logistics Center Settlement Agreement, dated April 28, 2021, made between Center for Community Action and Environmental Justice, Center for Biological Diversity, Coalition for Clean Air, Sierra Club, and San Bernardino Valley Audubon Society (Petitioner Parties) and Highland Fairview Properties, HF Properties, Sunnymead Properties, Theodore Properties Partners, 13451 Theodore, LLC, and HL Property Partners (collectively, "Highland Fairview"), be incorporated into the proposed Project. In response to these comments, the following table identifies settlement agreement measures from the World Logistics Center Settlement Agreement and identifies what mitigation measures for the proposed Project correlate with those from the World Logistics Center Project.

World Logistics Center	Proposed Project
Operational GHG and Criteria Pollutant Emissions Reduction Measures	
Electric Truck and Car Grant Programs	**Consistent. MM-AQ-19** requires tenants be provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
Maximize On-site Solar	**Consistent. MM-GHG-1** requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
Solar Advocacy Fund	**Not Applicable.** This provision applies to a significantly larger development.
Lower Carbon Hydrogen Available On site	**Not Applicable.** This provision applies to a significantly larger development.
On-site EV Charger	**Consistent. MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code.
Operational Air Quality (TACs)	
Electrification/No Diesel/Alternative Fuels i. At least 90% of all forklifts must be powered by electricity, hydrogen, or non-fossil zero-emission fuels. No forklift may be powered by diesel fuels. ii. 90% of all handheld landscaping equipment (e.g., leaf blowers, hedge trimmers, weed whackers, etc.) shall be electric or meet most current CARB standard within five years of the standard's	**Consistent. MM-AQ-18** requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable. **MM-AQ-14** requires use of electric or battery-operated equipment for landscape maintenance. **MM-GHG-4** requires installation of water

World Logistics Center	Proposed Project
implementation, to be enforced by including this requirement in all service contracts. iii. Hot water heaters for office and bathrooms shall be powered either through solar cells mounted on the roofs of the buildings or solar-generated electricity. iv. Only electric appliances shall be used in building office areas (e.g., electric stoves). v. Diesel powered generators will be prohibited unless necessary due to emergency situations or constrained supply. vi. All "yard goats," yard trucks, and hostlers will be powered by electricity or a nondiesel alternative.	heaters with an energy factor of .92 or higher. **MM-GHG-1** requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. **MM-AQ-24** prohibits the use of diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.
Auxillary Power Unit (APU) i. All truck idling shall be limited to no more than 5 minutes. ii. Each warehouse building shall provide an on-site air-conditioned lounge with a vending machine(s), a seating area, restrooms, workstations, shower facilities, and a television. The lounge shall be regularly maintained, cleaned, and stocked. iii. WLC shall provide at least one APU plug-in for every 35 dock doors at multiple locations within the Specific Plan area where trucks park and signage shall be provided in English and Spanish identifying where such APU plug-ins are located.	**Consistent. MM-AQ-17** limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use. **MM-AQ-9** requires any facility totaling more than 400,000 square feet to include a truck operator lounge equipped with clean and accessible amenities such as restrooms, vending machines, television, and air conditioning. **MM-AQ-8** requires all TRU loading docks provide electrical hookups and all loading docks are designed to be compatible with SmartWay trucks.
Warehouse construction i) WLC shall construct all warehouse buildings to achieve at least LEED Silver Certification for core and shell. If the WLC seeks to advertise a building as having LEED Silver Certification, it shall apply for certification. If certification is granted, notice shall be provided to Petitioners. ii) Warehouse roof areas not covered by solar panels shall be constructed with materials with an initial installation Solar Reflective Index Value of not less than 39.	**Consistent. MM-AQ-6** requires all buildings achieve the 2023 LEED Silver certification standards or equivalent, at a minimum. **MM-GHG-4** requires construction of modest cool roof, defined as Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance and 0.75 thermal emittance.
Cold Storage All transport refrigeration units (TRUs) shall have electric plug-ins and electrical hookups shall be provided at all TRU loading docks. WLC shall notify petitioners in writing before filing any applications for cold storage in warehouses.	**Consistent. MM-AQ-8** requires all TRU loading docks provide electrical hookups.

World Logistics Center	Proposed Project
Construction Emissions/Dust	
All construction equipment shall meet or be cleaner than Tier 4 standards, except if the construction contractor certifies that it is not feasible to use exclusively Tier 4 equipment due to limited availability. In all events, at least 80% of construction equipment shall meet or be cleaner than Tier 4 standards for the life of the project's construction.	**Consistent. MM-AQ-1** requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better.
In the event that diesel-powered construction equipment becomes available (1) with improved emission control devices that reduce particulate matter emissions, including fine particulate matter, and reduces NOx emissions, (2) at commercially reasonable prices, and (3) in sufficient quantities to be reasonably available, then WLC shall use such construction equipment.	**Consistent. MM-AQ-1** requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better.
No diesel-powered portable generators shall be used, unless necessary due to emergency situations or constrained supply	**Consistent. MM-AQ-3** prohibits the use of diesel-powered portable generators, unless necessary due to emergency situations or constrained supply.
No idling longer than five minutes shall be permitted.	**Consistent. MM-AQ-3** prohibits construction equipment idling longer than 3 minutes.

Project Consistency with Centerpoint Properties Air Quality Conditions of Approval

Comments were received requesting that all air quality mitigation measures included in the Centerpoint Properties Air Quality Conditions of Approval be incorporated into the proposed Project. In response to these comments, the following table identifies conditions of approval from the Centerpoint Properties Air Quality Conditions of Approval and identifies what mitigation measures for the proposed Project correlate with those from the Centerpoint Properties project.

Centerpoint Properties	Proposed Project
Air Quality	
The project applicant shall ensure, at minimum, the use of equipment that meets the United States Environmental Protection Agency's (EPA) Tier 4 Interim emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower for all site preparation, grading, and building construction activities, unless it can be demonstrated, to the Contra Costa County Department of Conservation and Development's satisfaction, that such equipment is not available.	**Consistent. MM-AQ-1** requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better.
The project's construction contractor shall comply with the following Bay Area Air Quality Management District (BAAQMD) Best Management Practices (BMPs) for reducing construction emissions of PM10 and PM2.5: Dust control measures.	**Consistent.** The Project will comply with SCAQMD Rule 403, Fugitive Dust.

Centerpoint Properties	Proposed Project
Odor Management Plan for • Composting, green waste, or recycling facilities • Fiberglass manufacturing facilities • Painting/coating operations • Large-capacity coffee roasters • Laboratory operations • Food-processing facilities	**Not Applicable.** The proposed Specific Plan prohibits these odor-causing land uses.
Zero Emission Vehicle Requirements	
The property owner/tenant/lessee shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025 or when commercially available for the intended application, whichever date is later.	**Consistent. MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
The property owner/tenant/lessee shall utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2023, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2025, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2027.	**Consistent. MM-AQ-20** requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later.
The property owner/tenant/lessee shall ensure all on-site equipment and vehicles (e.g., yard hostlers, yard equipment, forklifts, yard trucks and tractors, and pallet jacks) used within the project site are zero-emission from start of operations.	**Consistent. MM-AQ-18** requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable.
The property owner/tenant/lessee shall use the cleanest technologies available and provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on-site.	**Consistent. MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. **PDF-GHG-1** requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. **MM-AQ-11** requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. **MM-AQ-13** requires electrical service in the vicinity of landscaped areas or charging stations in the buildings. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.

Centerpoint Properties	Proposed Project
Idling is strictly prohibited on the subject property and adjacent streets in the Richmond/San Pablo area. The property owner/tenant/lessee shall inform all truck drivers associated with the business of this prohibition.	**Consistent. MM-AQ-17** limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use.
Applicant/tenant/lessee shall periodically sweep the property to remove road dust, tire wear, brake dust and other contaminants in parking lots.	**Consistent. MM-AQ-23** requires the facility operator to sweep the property, including parking lots and truck courts, twice a month to remove road dust, tire wear, brake dust, and other contaminants.
Applicant/tenant/lessee shall not use diesel back-up generators on the property unless absolutely necessary. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Applicant/tenant/lessee shall make every effort to utilize emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.	**Consistent. MM-AQ-24** prohibits the use of diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.
The property owner/tenant/lessee shall monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation.	**Consistent. MM-AQ-25** requires the facility operator to monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable.
Preferred Truck Route	
Preferred truck routes shall be implemented during all on-going business operations and shall be included as part of contractual lease agreement language to ensure the tenants/lessees are made aware of the preferred route for heavy-duty trucks.	**Consistent. MM-AQ-15** requires installation of signs clearly identifying the approved truck routes have been installed along the truck routes to and from the project site and within the project site.
Solar Power Generation	
At least 30-days prior to applying for a building permit, the applicant shall submit evidence to the CDD staff for review and approval, demonstrating that the subject building(s) have been designed to be solar ready by meeting or exceeding the current California Building Code (e.g., structurally able to support solar panels on roofs, appropriately sized electrical panels and conduit, etc.).	**Consistent. MM-GHG-1** requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.

Project Consistency with Stockton Mariposa Industrial Complex Air Quality Mitigation Measures

Comments were received requesting that all air quality mitigation measures included in the Stockton Mariposa Industrial Complex Mitigation Monitoring and Reporting Program (MMRP) be incorporated into the proposed Project. In response to these comments, the following table identifies air quality mitigation measures from the Stockton Mariposa Industrial Complex MMRP and identifies what mitigation measures for the proposed Project correlate with those from the Stockton Mariposa Industrial Complex Project.

Stockton Mariposa Industrial Complex	Proposed Project
Construction Emissions Reduction Measures	
AIR-1: Prior to the issuance of the first building permit, the applicant/developer shall demonstrate compliance with the SJVAPCD Rule 9510 (Indirect Source Review) to reduce growth in both NOx and PM10 emissions, as required by SJVAPCD and City requirements.	**Consistent. MM-AQ-21** requires any future tenants to comply with all applicable SCAQMD rules, including Rule 2305, the Warehouse Indirect Source Rule.
AIR-2: The project shall comply with SJVAPCD Regulation VIII for the control of dust emissions during project construction. A project Dust Control Plan shall be submitted to the SJVAPCD as required by Regulation VIII. Enforcement of Regulation VIII is the direct responsibility of the SJVAPCD. City Building inspectors shall monitor conformance with approved plans and specifications.	**Consistent.** The Project will comply with SCAQMD Rule 403, Fugitive Dust.
AIR-3: Architectural Coatings: Construction plans shall require that architectural and industrial maintenance coatings (e.g., paints) applied on the project site shall be consistent with a VOC content of <10 g/L. Developer or tenant is not expected to exercise control over materials painted off site.	**Consistent. MM-AQ-4** requires that, prior to issuance of building permits, the developer's construction plans shall ensure the Project will utilize "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the Applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.
AIR-4: SJVAPCD Regulation VIII Compliance: Construction plans and specifications shall include a Dust Control Plan incorporating the applicable requirements of Regulation VIII, which shall be submitted to the SJVAPCD for review and approval prior to beginning construction in accordance with the requirements of Regulation VIII.	**Consistent.** The Project will comply with SCAQMD Rule 403, Fugitive Dust.
AIR-5: Construction Worker Trip Reduction: Project construction plans and specifications will require contractor to provide transit and ridesharing information for construction workers.	**Consistent. MM-AQ-3** requires the construction contractor to provide transit and ridesharing information to on-site construction workers.
AIR-6: Construction Meal Destinations: Project construction plans and specifications will require the contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service.	**Consistent. MM-AQ-3** requires the construction contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service.
AIR-7: To reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available off-road	**Consistent. MM-AQ-1** requires that off-road equipment used during construction shall

Stockton Mariposa Industrial Complex	Proposed Project
construction equipment, including the latest tier equipment (recommended by SJVAPCD).	meet CARB Tier 4 Final emission standards or better.
Operational Emissions Reduction Measures	
AIR-8: The project shall comply with the emission reduction requirements of SJVAPCD Rule 9510 for project operations.	**Consistent.** MM-AQ-21 requires any future tenants to comply with all applicable SCAQMD rules, including Rule 2305, the Warehouse Indirect Source Rule.
AIR-9: Prior to building occupancy, employers with 100 or more eligible employees shall submit an Employer Trip Reduction Implementation Plan (ETRIP) to the City for review and approval, as required by SJVAPCD Rule 9410. A copy of the ETRIP shall be provided to the SJVAPCD. Employers shall facilitate participation in the implementation of the ETRIP by providing information to its employees explaining methods for participation in the Plan and the purpose, requirements, and applicability of Rule 9410.	**Consistent.** Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, MM-AQ-21 requires each facility to implement or join a transportation demand management program, which would include: • Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees. • Create and maintain a "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work. • Inform employees of public transit and commuting services available to them (e.g., social media, signage). • Provide on-site transit pass sales and discounted transit passes. • Guarantee a ride home. • Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees. • Designating areas for employee pickup and drop-off. • Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.
AIR-10: The project shall comply with SJVAPCD Rule 4101, which prohibits emissions of visible air contaminants to the atmosphere and applies to any source operation that emits or may emit air contaminants.	**Consistent.** The Project would comply with SCAQMD Rule 401, Visible Emissions, as applicable.
AIR-11: The project shall comply with SJVAPCD Rule 4601, which limits project has agreed to abide by more stringent VOC emissions	**Consistent.** MM-AQ-4 requires that, prior to issuance of building permits, the

Stockton Mariposa Industrial Complex	Proposed Project
requirements. emissions of volatile organic compounds from architectural coatings by specifying storage, clean up and labeling requirements.	developer's construction plans shall ensure the Project will utilize "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the Applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.
AIR-12: The project shall comply with SJVAPCD Rule 4601, which limits emissions of volatile organic compounds from architectural coatings by specifying storage, clean up and labeling requirements. (The project has agreed to abide by more stringent VOC emissions requirements.	**Consistent. MM-AQ-4** requires that, prior to issuance of building permits, the developer's construction plans shall ensure the Project will utilize "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the Applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.
AIR-12: Solar Power: Owners, operators or tenants shall include with the building permit application, sufficient solar panels to provide power for the operation's base power use at the start of operations and as base power use demand increases. Project sponsor shall include analysis of (a) projected power requirements at the start of operations and as base power demand increases corresponding to the implementation of the "clean fleet" requirements, and (b) generating capacity of the solar installation.	**Consistent. MM-GHG-1** requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
AIR-13: Emission Standards for Heavy-Duty Trucks: The following mitigation measures shall be implemented during all on-going business operations and shall be included as part of contractual lease agreement language to ensure the tenants/lessees are informed of all on-going operational responsibilities. The property owner/tenant/lessee shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025 or when commercially available for the intended application, whichever date is later.	**Consistent. MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
AIR-14: Zero Emission Vehicles: The property owner/tenant/lessee shall utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2023, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2025, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2027.	**Consistent. MM-AQ-20** requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero

Stockton Mariposa Industrial Complex	Proposed Project
	emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later.
AIR-17: Zero Emission Forklifts, Yard trucks and Yard Equipment: Owners, operators or tenants shall require all forklifts, yard trucks, and other equipment used for on-site movement of trucks, trailers and warehoused goods, as well as landscaping maintenance equipment used on the site, to be electrically powered or zero-emission. The owner, operator or tenant shall provide on-site electrical charging facilities to adequately service electric vehicles and equipment.	**Consistent. MM-AQ-18** requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable.
AIR-18: Truck Idling Restrictions: Owners, operators or tenants shall be required to make their best effort to restrict truck idling on site to a maximum of three minutes, subject to exceptions defined by CARB in the document: *commercial_vehicle_idling_requirements_July 2016*. Idling restrictions shall be enforced by highly-visible posting at the site entry, posting at other on-site locations frequented by truck drivers, conspicuous inclusion in employee training and guidance material and owner, operator or tenant direct action as required.	**Consistent. MM-AQ-17** limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use.
AIR-19: Electric Truck Charging: At all times during project operation, owners, operators or tenants shall be required to provide electric charging facilities on the project site sufficient to charge all electric trucks domiciled on the site and such facilities shall be made available for all electric trucks that use the project site.	**Consistent. PDF-GHG-1** requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. **MM-AQ-11** requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.
AIR-20: Project Operations, Food Service: Owners, operators or tenants shall establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to operations employees.	**Consistent.** Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, **MM-AQ-21** requires each facility to implement or join a transportation demand management program, which would include offering shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, establish locations for food or catering truck service and cooperate with food

Stockton Mariposa Industrial Complex	Proposed Project
	service providers to provide consistent food service to employees.
AIR-21: Project Operations, Employee Trip Reduction: Owners, operators or tenants shall provide employees transit route and schedule information on systems serving the project area and coordinate ridesharing amongst employees.	**Consistent.** Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, **MM-AQ-21** requires each facility to implement or join a transportation demand management program, which would include: • Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees. • Create and maintain a "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work. • Inform employees of public transit and commuting services available to them (e.g., social media, signage). • Provide on-site transit pass sales and discounted transit passes. • Guarantee a ride home. • Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees. • Designating areas for employee pickup and drop-off. • Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.
AIR-22: Yard Sweeping: Owners, operators or tenants shall provide periodic yard and parking area sweeping to minimize dust generation.	**Consistent. MM-AQ-23** requires the facility operator to sweep the property, including parking lots and truck courts, twice a month to remove road dust, tire wear, brake dust, and other contaminants.
AIR-23: Diesel Generators: Owners, operators or tenants shall prohibit the use of diesel generators, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards.	**Consistent. MM-AQ-24** prohibits the use of diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and

Stockton Mariposa Industrial Complex	Proposed Project
	sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions.
AIR-24: Truck Emission Control: Owners, operators or tenants shall ensure that trucks or truck fleets domiciled at the project site be model year 2014 or later, and maintained consistent with current CARB emission control regulations.	**Consistent. MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
AIR-25: SmartWay: Owners, operators or tenants shall enroll and participate the in SmartWay program for eligible businesses.	**Consistent. MM-AQ-20** encourages tenants to become SmartWay partners, if eligible. **MM-AQ-8** requires all loading docks to be compatible with SmartWay trucks.
AIR-26: Designated Smoking Areas: Owners, operators or tenants shall ensure that any outdoor areas allowing smoking are at least 25 feet from the nearest property line.	**Consistent. MM-AQ-26** requires any outdoor areas allowing smoking are at least 25 feet from the nearest property line.
AIR-27: Project construction shall be subject to all adopted City building codes, including the adopted Green Building Standards Code, version July 2022 or later. Prior to the issuance of building permits, the applicant/developer shall demonstrate (e.g., provide building plans) that the proposed buildings are designed and will be built to, at a minimum, meet the Nonresidential Voluntary Measures of the California Green Building Standards code, Divisions A5.1, 5.2 and 5.5, including but not limited to the Tier 2 standards in those Divisions, where applicable, such as the Tier 2 advanced energy efficiency requirements as outlined under Section A5.203.1.2.	**Consistent. MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code.
AIR-28: All tenant lease agreements for the project site shall include a provision requiring the tenant/lessee to comply with all applicable requirements of the MMRP, a copy of which shall be attached to each tenant/lease agreement.	**Consistent. MM-AQ-27** requires tenants to comply with all applicable requirements of the MMRP, a copy of which shall be attached to each lease agreement.

Project Consistency with City of Fontana Ordinance 1891 Air Quality Measures

Comments were received requesting that all air quality measures included in City of Fontana Ordinance 1891 be incorporated into the proposed Project. In response to these comments, the following table identifies air quality measures from the City of Fontana Ordinance 1891 and identifies what mitigation measures for the proposed Project correlate with those from the City of Fontana Ordinance 1891.

City of Fontana Industrial Warehouse Ordinance	Proposed Project
Sec. 9.72 Signage and Traffic Patterns	
Anti-idling signs indicating a 3-minute diesel truck engine idling restriction shall be posted at industrial commerce facilities along entrances to the site and in the dock areas and shall be strictly enforced by the facility operator.	**Consistent. MM-AQ-17** requires legible, durable, weather-proof signs placed at truck access gates, loading docks, and truck parking areas that identify: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than three (3) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager, South Coast Air Quality Management District and the California Air Resources Board to report violations. One six square foot sign providing this information shall be located on the building between every two dock-high doors and the sign shall be posted in highly visible locations at the entrance gates, semi parking areas, and trailer parking locations.
Signs and drive aisle pavement markings shall clearly identify the on-site circulation pattern to minimize unnecessary on-site vehicular travel.	**Consistent. MM-AQ-12** requires an on-site signage program that clearly identifies the required on-site circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.
Signs shall be installed at all truck exit driveways directing truck drivers to the truck route as indicated in the Truck Routing Plan and State Highway System.	**Consistent. MM-AQ-15** requires signs clearly identifying the approved truck routes installed along the truck routes to and from the project site and within the project site.
Signs shall be installed in public view with contact information for a local designated representative who works for the facility operator and who is designated to receive complaints about excessive dust, fumes, and odors, and truck and parking complaints for the site, as well as contact information for the SCAQMD's on-line complaint system and its complaint call-line: 1-900-288-7664. Any complaints made to the facility operator's designee shall be answered within 72 hours of receipt.	**Consistent. MM-AQ-16** requires signage with contact information for the tenant representative, March JPA, County of Riverside, and SCAQMD for complaints about excessive noise, dust, fumes, odors, and perceived Code violations.
All signs under this Section shall be legible, durable, and weather-proof.	**Consistent. MM-AQ-17** requires legible, durable, weather-proof signs.
Prior to the issuance of a business license, City shall ensure for any facility with a building or buildings larger than 400,000 total square feet, that the facility shall include a truck operator lounge equipped with clean and accessible amenities such as restrooms, vending machines, television, and air conditioning.	**Consistent. MM-AQ-9** requires any facility totaling more than 400,000 square feet to include a truck operator lounge equipped with clean and accessible amenities such as restrooms, vending machines, television, and air conditioning.
Sec. 9-73 – Alternative Energy	
On-site motorized operational equipment shall be ZE (zero emissions).	**Consistent. MM-AQ-14** requires use of electric or battery-operated equipment for landscape maintenance. **MM-AQ-18** requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical

City of Fontana Industrial Warehouse Ordinance	Proposed Project
	charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable.
All building roofs shall be solar-ready, which includes designing and constructing buildings in a manner that facilitates and optimizes the installation of a rooftop solar photovoltaic (PV) system at some point after the buildings has been constructed.	**Consistent. MM-GHG-1** requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
The office portion of a building's rooftop that is not covered with solar panels or other utilities shall be constructed with light colored roofing material with a solar reflective index ("SRI") of not less than 78. This material shall be the minimum solar reflecting rating of the roof material for the life of the building.	**Consistent. MM-GHG-4** requires construction of modest cool roof, defined as Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance and 0.75 thermal emittance.
On buildings over 400,000 square feet, prior to issuance of a business license, the City shall ensure rooftop solar panels are installed and operated in such a manner that they will supply 100% of the power needed to operate all non-refrigerated portions of the facility including the parking areas.	**Consistent. MM-GHG-1** requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
At least 10% of all passenger vehicle parking spaces shall be electric vehicle (EV) ready, with all necessary conduit and related appurtenances installed. At least 5% of all passenger vehicle parking spaces shall be equipped with working Level 2 Quick charge EV charging stations installed and operational, prior to building occupancy. Signage shall be installed indicated EV charging stations and specifying that spaces are reserved for clean air/EV vehicles. Unless superior technology is developed that would replace the EV charging units, facility operator and any successors in interest shall be responsible for maintain the EV charging stations in working order for the life of the facility.	**Consistent. MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code.
Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide chilled, cooled, or freezer warehouse space, a conduit shall be installed during construction of the building shell from the electrical room to 100% of the loading dock doors that have potential to serve the refrigerated space. When tenant improvement building permits are issued for any refrigerated warehouse space, electrical plug-in units shall be installed at every dock door servicing the refrigerated space to allow transport refrigeration units (TRUs) to plug in. Truck operators with TRUs shall be required to utilize electric plug-in units when at loading docks.	**Consistent. MM-AQ-8** requires that all TRU loading docks provide electrical hookups.
Bicycle racks required per Section 30-714 and in the amount required for warehouse uses by Table 30-714 of the Zoning and Development Code. The racks shall include locks as well as electric plugs to charge electric	**Consistent.** The Project would provide bicycle parking facilities in compliance with Table 9.11.060-13 of the March JPA Development Code.

City of Fontana Industrial Warehouse Ordinance	Proposed Project
bikes. The rack shall be located as close as possible to employee entrance(s). Nothing in this section shall preclude the warehouse operator from satisfying this requirement by utilizing bicycle parking amenities considered to be superior such as locating bicycle parking facilities indoors or providing bicycle lockers.	
Sec. 9-74 – Operation and Construction	
Cool surface treatments shall be added to all drive aisles and parking areas or such areas shall be constructed with a solar-reflective cool pavement such as concrete.	**Consistent.** **MM-AQ-10** requires cool surface treatments to be added to all drive aisles and parking areas or such areas shall be constructed with a solar-reflective cool pavement such as concrete.
Use of super-compliant VOC architectural and industrial maintenance coatings (e.g., paints) shall be required.	**Consistent.** **MM-AQ-4** requires that, prior to issuance of building permits, the developer's construction plans shall ensure the Project will utilize "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the Applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.
The following environmentally responsible practices shall be required during construction: • The applicant shall use reasonable best efforts to deploy the highest rated CARB Tier technology that is available at the time of construction. Equipment proposed for use that does not meet the highest CARB Tier in effect at the time of construction, shall only be approved for use at the discretion of the Planning Director and shall require proof from the construction contractor that, despite reasonable best efforts to obtain the highest CARB Tier equipment, such equipment was unavailable. • Use of electric-powered hand tools, forklifts, and pressure washers. • Designation of an area in any construction site where electric-powered construction vehicles and equipment can charge. • Identification in site plans of a location for future electric truck charging stations and installation of a conduit to that location. Diesel-powered generators shall be prohibited except in case of emergency or to establish temporary power during construction.	**Consistent.** **MM-AQ-1** requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. **MM-AQ-3** requires the construction contractor to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible, and to designate an area where electric-powered vehicles and equipment can be charged. **PDF-GHG-1** requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. **MM-AQ-3** further prohibits the use of diesel-powered portable generators, unless necessary due to emergency situations or constrained supply.

9.1.3 Topical Response 3 – Hazards

This topical response covers comments raised about the existing environment relative to past uses at the Project site. Specifically, commenters asked about the presence of Per- and Polyfluoroalkyl Substances (PFAS), radioactive materials, and chemical and biological munitions. As such, the following topical response provides more detailed information relative to each of these potential hazards. Several of these topics are addressed in Recirculated Section 4.8, Hazards and Hazardous Materials, but are included here as well for the sake of completeness.

Per- and Polyfluoroalkyl Substances

In response to concerns raised of the possible presence of PFAS on the Project site, Recirculated Section 4.8, Hazards and Hazardous Materials, discusses the potential presence of PFAS and, based on the conclusions of the former investigations and relevant regulatory agencies, determined there is no evidence of potential PFAS concentrations within the Specific Plan Area that pose a public health hazard.

The following background information can also be found in the Supplemental Environmental Assessment Information Report (Leighton 2023 Report), attached as Appendix J-6 of this Final EIR.[1] PFAS are a group of manufactured chemicals that have been used in industry and consumer products since mid-1900s. There are thousands of different PFAS. According to the U.S. Environmental Protection Agency (USEPA), Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) are two of the most widely used and studied chemicals in the PFAS group, but PFOA and PFOS have been replaced in the United States with other PFAS in recent years. Individuals can be exposed to PFAS in a variety of ways, including through drinking water contaminated with PFAS, eating certain foods that may contain PFAS, using products made with PFAS or packaged in materials containing PFAS, swallowing contaminated soil or dust, breathing air contaminated with PFAS, and working in occupations such as firefighting or chemicals manufacturing and processing. PFAS substances are generally considered non-volatile.[2] USEPA cites the following health effects associated with PFAS exposure as indicated by current peer-reviewed scientific studies:

- Reproductive effects such as decreased fertility or increased high blood pressure in pregnant women.
- Developmental effects or delays in children, including low birth weight, accelerated puberty, bone variations, or behavioral changes.
- Increased risk of some cancers, including prostate, kidney, and testicular cancers.
- Reduced ability of the body's immune system to fight infections, including reduced vaccine response.
- Interference with the body's natural hormones.
- Increased cholesterol levels and/or risk of obesity.

In April 2024, EPA designated 2 PFAS, perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS), as hazardous substances under CERCLA.[3] On April 10, 2024, EPA released its Final Rule on Drinking Water Standards

[1] A portion of the 2023 Leighton Report was inadvertently not included with the Recirculated EIR. All of the relevant results of the 2023 Leighton Report were summarized in the Recirculated Draft EIR and the underlying source reports were cited. As such, this inadvertent omission does not impact the findings or analysis contained in the Recirculated Draft EIR.

[2] Fluorotelomer alcohols (FTOH) are the only PFAS substances considered volatile. FTOHs have been identified in consumer products like carpet, commercial carpet-care liquids, household carpet/fabric-care liquids, treated apparel, treated home textiles, treated non-woven medical garments, floor waxes, food-contact paper, membranes for apparel, and thread-sealant tapes. While FTOHs are considered volatile, there are no human toxicological values for FTOH and these compounds are not regulated in the environment by California or by the U.S. EPA.

[3] EPA Final Rule: Designation of Perfluorooctanoic Acid (PFOA) and Perfluorooctanesulfonic Acid (PFOS) as CERCLA Hazardous Substances. April 17, 2024.

for PFAS, setting the maximum contaminant levels for 6 types of PFAS (including PFOS and PFOA) in drinking water. The Project does not involve groundwater extraction.

In May 2022, the Air Force prepared a Final Quality Program Plan (QPP) for the Remedial Investigation of PFAS at the Former March Air Force Base (AFB) and March Air Reserve Base (ARB) (the PFAS QPP). The PFAS QPP was conducted to "[d]etermine the nature and extent of PFAS (perfluorooctane sulfonate [PFOS], perfluorooctanoic acid [PFOA], and perfluorobutane sulfonic acid [PFBS]) in soil and groundwater" at the March AFB. The PFAS QPP was reviewed and approved by the USEPA, the Santa Ana Regional Water Quality Control Board, and the California Department of Toxic Substances Control. In connection with the PFAS QPP, a preliminary assessment was conducted to determine the potential release locations of PFAS at the March ARB as a result of Air Force operations. The preliminary assessment determined that the only potential release location within the Specific Plan area was the West March AFFF Area Landfill No. 5, which is also known as and referred to as Area 3.

Attachment A to the Leighton 2023 Report (Appendix J-6) contains a map showing the proposed development in the former ordnance storage area, as well as the proposed extensions of Cactus Avenue and Brown Street to the east of this area. The map also shows the approximate extent of former Landfill No. 5. As shown on the map and reproduced in part below as Figure 1, only a small portion of the Cactus Avenue extension may extend over former Landfill No. 5. This proposed extension of Cactus Avenue is the only Project component that extends into the proximity of Landfill No. 5.



Figure 1

The Air Force collected groundwater, sediment, and surface water samples at Landfill No. 5 to screen for potential residual PFAS compounds. One groundwater sample was reported to contain 91.9 ng/L of one PFAS compound (PFOA), exceeding the reported 40 ng/L screening level for this compound. Groundwater in this area is 15-25 feet deep and will not be impacted by construction of Cactus Avenue.

The sediment and surface water samples of Landfill No. 5 were reported to contain no PFAS compounds exceeding their reported screening levels. (QPP, 2022). Soil samples were collected from three locations within the former Landfill No.5 and there were "[n]o detections of PFOA, PFOS, or PFBS above screening criteria" and, as such, "[n]o additional soil sampling is recommended." (USAF Final Technical Working Group Meeting Minutes, February 2023).

As seen in the Figure 2 below, sample location MARPSB010 is the closest sample location to the Cactus Avenue extension, and no PFAS was detected above the screening levels. Screening criteria for delineation in the remedial investigation are the May 2022 USEPA RSLs using a hazard quotient of 0.1. The SARWQB concurred on April 3, 2023. (SARWQB, 2023). As detailed in the Leighton 2023 Report (Appendix J-6), there is no significant evidence to indicate the proposed Cactus Avenue extension construction activities would create an unacceptable health risk to surrounding developments or future roadway users.

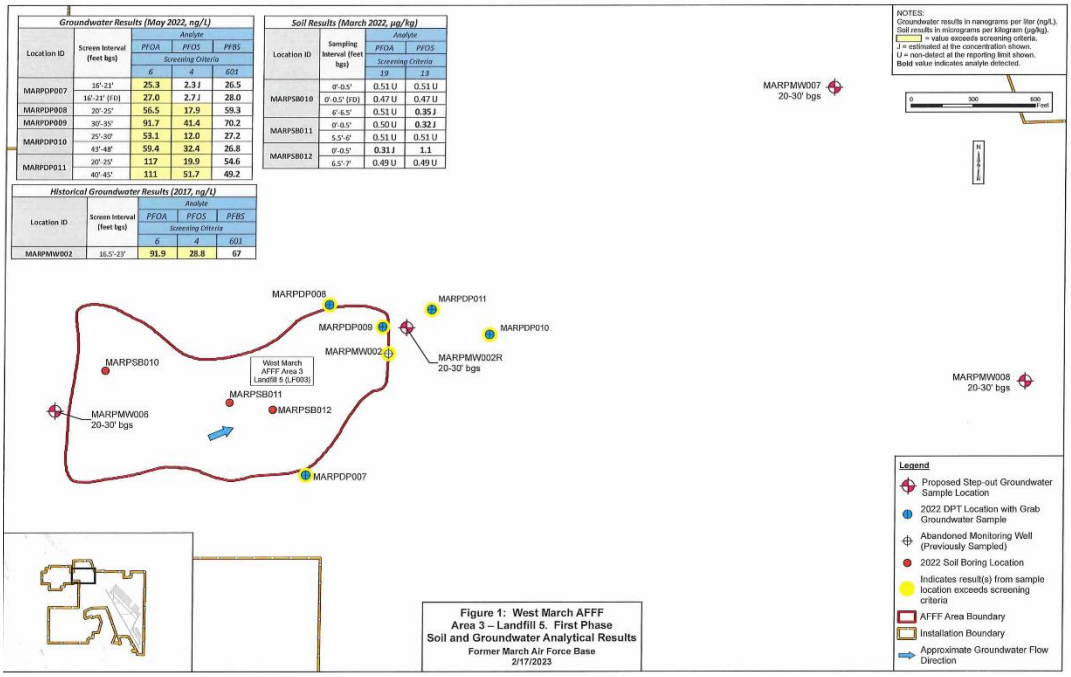


Figure 2

Radioactive Materials

In response to concerns raised of the possible presence of radioactive materials in the former Weapons Storage Area (WSA), Recirculated Section 4.8, Hazards and Hazardous Materials, was revised to include a detailed summary of the Leighton 2023 Report (Appendix J-6), which explains that the Air Force and March JPA thoroughly investigated the potential for radiological contamination in the former WSA. Please see Section 4.8, Hazards and Hazardous Materials, of the Final EIR for a summary of the previous investigations.

In 1992, the Environmental Protection Agency (USEPA) performed an aerial photographic analysis of March Air Force Base (AFB), including the WSA. This analysis indicated that no burial sites within the WSA were identified. (Cabrera, 2006).

In 2000, Earth Tech, Inc. completed a Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) Final Status Survey (FSS) of the WSA. The MARSSIM indicated that "[b]ased on a review of the available records and documentation related to the WSA, the United States Air Force only stored weapons, and possibly non-conventional weapons, at the WSA while no non-conventional weapons maintenance activities or maintenance on unsealed sources of radioactive material were performed at the WSA. In addition, existing anecdotal information indicated that non-conventional weapons were stored at the WSA on a temporary or transient basis only, and not as a permanent presence." (EarthTech, 2000). EarthTech's investigation included measurements of alpha and gamma radiation inside 16 structures at the WSA that may have stored non-conventional weapons and confirmed the absence of radioactive contamination at the WSA. A confirmation survey completed by health physicists from

the State of California Department of Health Services (DHS) on June 14, 2000 confirmed the absence of radioactive contamination at the WSA. In a letter dated August 24, 2000, DHA stated that it "is in concurrence that the buildings investigated in [the MARSSIM] meet the State's release criteria for unrestricted release." (DHS, 2000).

In September 2006, Cabrera Services, Inc. completed a Preliminary Assessment and Site Inspection (PA/SI) of the WSA. The stated objectives of the PA/SI were to:

- Identify subsurface anomalies that could represent potential burial or disposal locations for weapons maintenance waste materials using non-invasive techniques.
- Prioritize identified subsurface anomalies and make recommendations for additional investigations to confirm the presence of potential burial and disposal locations.
- Identify surface areas with elevated levels of residual radioactivity that could represent buried wastes (Cabrera, 2006).

Cabrera did not identify any radiologically-impacted materials or burial pits and concluded that no further action for surface soils or subsurface investigation of burial sites in the WSA is recommended based on historical information and the results of geophysical, radiological, and subsurface investigations (Cabrera, 2006).

The California Regional Water Quality Control Board, Santa Ana Region (SARWQCB) reviewed Cabrera's PA/SI (2006) and responded as follows via a November 27, 2006 letter:

> The investigation reviewed existing information and attempted to confirm any potential buried or disposal locations primarily using noninvasive techniques. Radiological surveys were also conducted to scan for surface contamination. One anomalous area was investigated utilizing test pits. No further action for subsurface investigation of burial sites was recommended, based on historical information and the results of the investigation.
>
> We concur with your finding of no release at the site, and the recommendation for no further action for the Weapons Storage Area.
>
> (SARWQCB, 2006)

This finding is consistent with the USAF's Final Comprehensive Site Evaluation Phase I Report for its Military Munitions Response Program dated March 2013 (USAF MMRP). That evaluation noted that the WSA was used for "nuclear weapon storage only," and concluded that further munitions response was not required. Munition response is defined as "Response actions, including investigation, removal actions, and remedial actions to address the explosives safety, human health, or environmental risks presented by unexploded ordnance (UXO), discarded military munitions (DMM), or munitions constituents (MC), or to support a determination that no removal or remedial action is required." No other areas of the March ARB were identified as storage, maintenance, or disposal areas for radioactive materials. As such, based on this report, no further evaluation of radioactive materials is required prior to redevelopment of the Project.

As discussed above and in Recirculated Section 4.8, Hazards and Hazardous Materials, based on the conclusions of the former investigations and relevant regulatory agencies, there is no evidence of potential radioactive contamination anywhere within the Specific Plan area that poses an unacceptable public health hazard.

Chemical and Biological Munitions

Regarding concerns raised as to the possible storage of chemical and biological munitions at the WSA, Recirculated Section 4.8, Hazards and Hazardous Materials, was revised to discuss the previous storage of biological or chemical

weapons at the Project site. Articles published in the New York Times on October 12, 1969 as well as July 6, 2023 both indicate that the country's chemical munitions were stockpiled at facilities in eight states, none of which include California.[4] The 2023 NYT Article details the destruction of the chemical munitions at these bases, calling it "the dangerous job of eliminating the world's only remaining declared stockpile of lethal chemical munitions."

As further detailed in the Leighton 2023 Report (Appendix J-6), CH2MHill completed detailed record searches in connection with its investigation to identify and fully evaluate suspected problems associated with past hazardous materials disposal sites on Department of Defense (DOD) facilities. This detailed record search included a detailed review of pertinent installation records, 18 outside agency contacts for documents relevant to the records search effort, and an on-site base visit. The base visit included interviews with 81 past and present base employees, ground and helicopter tours of the installation and past disposal areas, and a detailed search of the installation records. Prior to the base visit, the Public Affairs Office provided a press release announcing the study and requesting persons knowledgeable of past disposal practices at the installation to contact March AFB. With respect to biological and chemical weapons, the CH2MHill Report indicated the following:

> Review of available base records and information obtained during the base personnel interviews produced no evidence of the past or present storage, disposal, or handling of biological or chemical warfare agents at March AFB.

The closure report for Site 25 (also referred to as Area 20, refer to Figure 4.8-1 of Recirculated Section 4.8, Hazards and Hazardous Materials), which is located just southeast of the Specific Plan Area, and within the proposed Conservation Area of the Project site (2009, Air Force Real Property Agency), notes the following:

> "A 1996 memorandum from the U.S. Army Corps of Engineers (USACE) indicated the Corps Omaha District Rapid Response Program was requested to perform a removal action at Site 25. Their involvement was as a result of references to chemical warfare agents disposed at Site 25 in the 1993 RI report. Due to the conflicting information obtained to date, the Omaha District requested re-interviews of select personnel be performed to validate the statements made (USACE, 1996)."
>
> "The combined IT/USACE investigation found the following:
>
> > Only one individual named in the RI as having knowledge of ordnance disposal at Site 25 had first-hand knowledge of ordnance residue disposal conducted at Site 25. The one individual stated that no chemical warfare munitions were buried at Site 25.
> >
> > A search of Camp Haan records concluded that all significant live weapons training was conducted at other U.S. Army Installations in California. Only small arms and tear gas training was conducted at former Camp Haan or at March AFB.
> >
> > Based on these findings, it was concluded that no chemical warfare material was disposed of at Site 25."

These findings are consistent with the Final Comprehensive Site Evaluation Phase I Report which was prepared for the Military Munitions Response Program in March 2013 (USAF MMRP). That report identified Area Number 2 as having Chemical Warfare Materiel (CWM) in the form of magazines and gas chamber. The report explains that the "CWM (Magazines and Gas Chamber) was located in buildings T1260, T1261, and T1262 just off the southeast

[4] The New York Times, *War Chemicals Kept at 8 Bases*, October 12, 1969 ("1969 NYT Article") and *U.S. Is Destroying the Last of Its Once-Vast Chemical Weapons Arsenal,* July 6, 2023 ("2023 NYT Article").

corner of the runway and south of Iris Avenue." It further indicates that "[h]istoric records reveal that CWM was stored and training was conducted at March AFB, including a Unit Gas Officers' School. Based on a letter from 1944, the CWM (magazine and Gas Chamber) buildings were used to store: M1 sample gas ID set, M1 detonating gas ID set, HC smoke pots, 2-chloro-1-phenylethanone (CN) capsules, M1 smoke pots, and titanium tetrachloride and chlorosulfonic acid drums." That report noted that "[t]he CWM (Magazine and Gas Chamber) buildings are no longer present. The Gas Chamber and Magazines have been demolished and no evidence of their former location was found. The site has been reworked and is now an open field." Area 2 is located more than 3 miles southeast of the Project site, across Interstate 215, and will not be disturbed or impacted by the Project.

The Leighton 2023 Report (Appendix J-6) concludes that during Leighton's various reported assessments, they "have found no evidence to indicate biological or chemical munitions were likely stored in these, or other buildings, on the former ordnance storage area, or that the Water Board has expressed concerns with such."

In addition to the Leighton 2023 Report (Appendix J-6), the Water Board and EPA investigations of the Specific Plan area do not raise biological or chemical munitions as a concern. As noted above, the Water Board issued a no further action letter for the site in November 2006. Further, the 2000 CADHS survey confirmed the results of the final status survey, of which the recommendation was that "the subject property may be transferred without restrictions for public use."

In light of the available information, there is no evidence or indication that biological or chemical munitions were stored or disposed of on the Project site. CEQA does not require speculation. *See, e.g. Laurel Heights Improvement Assn. v Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1137. Because there is no evidence of storage or disposal of biological or chemical weapons at the Project site, much less a release of such munitions, construction activities in the WSA will not result in an adverse impact on the existing residential uses that are located in the vicinity of the WSA.

References

2009, Air Force Real Property Agency, Memorandum for Record, AR File No. 2409, dated March 19, 2009.

9.1.4 Topical Response 4 – Project Consistency

This topical response discusses Project consistency with the following: the Good Neighbor Guidelines for the City of Riverside, the Good Neighbor Guidelines for the Western Riverside Council of Governments (WRCOG), the 2003 Settlement Agreement with Center for Community Action and Environmental Justice and Community Alliance for Riverside's Economy & Environment, and the 2012 Settlement Agreement with Center for Biological Diversity and San Bernardino Valley Audubon Society.

Good Neighbor Guidelines for the City of Riverside

A number of comments questioned the Project's consistency with the City of Riverside's Good Neighbor Guidelines. Chapter 19.435 of the City of Riverside Municipal Code implements the Good Neighbor Guidelines for Siting New and/or Modified Industrial Facilities adopted by the City Council on November 10, 2020. The following table includes an analysis of the Project's consistency with the City of Riverside's Good Neighbor Guidelines.

City "Good Neighbor" Policy	Project Consistency
Section 19.435.030 – Site Location, operation and development standards. ***A. Warehousing and distribution facilities 10,000 square feet or less***	
1. Driveways, loading areas, docks, truck wells and internal circulation routes shall be oriented away from residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals or other public places to the maximum extent feasible.	**Consistent**. Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. Industrial buildings must be set back a minimum of 1,000 feet from residential. In addition, any industrial-use building will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 3.5.4, Off-Street Loading Facilities, and Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan require truck courts and loading docks to be oriented away or screened to reduce visibility public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties, and prohibits loading and unloading activities within view of public streets or residential land uses.
2. Loading areas, docks, truck wells and outdoor storage areas shall be fully screened from view of residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals or other public places and from public rights-of-way with buildings, freestanding walls and fences, landscaping or other means to the satisfaction of the Approving Authority. Where loading areas, docks, truck wells and outdoor storage areas are located adjacent to a Residential Zone or use, they shall be fully screened from view of the adjacent Residential Zone or use by means of a solid wall with a minimum height of eight feet as	**Consistent**. Section 3.5.4, Off-Street Loading Facilities, and Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan require truck courts and loading docks to be oriented away or screened to reduce visibility public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties, and prohibits loading and unloading activities within view of public streets or residential land uses. Section 4.4.1 Walls and Fences of the Specific Plan requires minimum 14-foot tall screen walls that surround the entire truck court and loading areas. Figures 4-17 and 4-19 Landscape Buffer Interface requires a minimum 30-foot landscape buffer to any parcel facing a sensitive receptor.

City "Good Neighbor" Policy	Project Consistency
measured from the finished grade of the adjacent Residential Zone or use.	
3. Operations, including loading, unloading, staging and storage of trucks and trailers, shall comply with Title 7 (Noise) of this Code.	**Consistent**. The Project's Noise Impact Analysis (Appendix M-1) determined the Project's on-site operational noise would not exceed March JPA, County of Riverside, or City of Riverside standards. Section 3.5.4 Off-Street Loading Facilities of the Specific Plan includes this restriction: "any loudspeaker, bells, gongs, buzzers, or other noise attention or attracting devices shall not exceed 55 dBA at any one time beyond the boundaries of the property. Sounds emitting from any of the aforementioned devices, including or live or recorded music, shall cease between the hours of 10:00 p.m. and 7:00 a.m. if the sound therefrom creates a noise disturbance across the property line of a residential use."
Section 19.435.030 – Site Location, operation and development standards. *B. Warehousing and distribution facilities 10,000 square feet and less than 100,000 square feet*	
1, 2, 3. Same as above.	**Consistent**. Same as above.
4. Idling of trucks queued or operated on site shall not exceed five minutes.	**Consistent.** MM-AQ-17 limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use.
5. Where transport by temperature-controlled trucks or trailers is proposed, on-site electrical hookups shall be provided at loading docks. Idling or use of auxiliary truck engine power to power climate-control equipment shall be prohibited.	**Consistent.** Section 4.4.2 of the Specific Plan requires loading bays that are utilized by refrigerated trailers to have dock seals and be equipped with plug-in electrical outlets. In addition, MM-AQ-8 requires that all TRU loading docks provide electrical hookups and all loading docks are designed to be compatible with SmartWay trucks.
Section 19.435.030 – Site Location, operation and development standards. *C. Warehousing and distribution facilities 100,000 square feet and larger*	
1, 2. Same as above.	**Consistent**. Same as above.
3. Sufficient aisle space shall be provided on-site to accommodate the on-site queuing of trucks as determined by a Traffic Impact Analysis, if required. Queuing lanes or aisles shall not obstruct regular vehicular or pedestrian circulation or emergency equipment access.	**Consistent.** Section 3.5.4, Off-Street Loading Facilities, requires loading or unloading facilities to be sized and located so that they do not require trucks to be located in required front or street side yards during loading and unloading activities, ensuring trucks do not spill onto surrounding public streets.
4. Operations, including loading, unloading, staging and storage of trucks and trailers, shall comply with Title 7 (Noise) of this Code.	**Consistent**. The Project's Noise Impact Analysis (Appendix M-1) determined the Project's on-site operational noise would not exceed March JPA, County of Riverside, or City of Riverside standards. Section 3.5.4 Off-Street Loading Facilities of the Specific Plan includes this restriction: "any loudspeaker, bells, gongs, buzzers, or other noise attention or attracting devices shall not exceed 55 dBA at any one time beyond the boundaries of the property. Sounds emitting from any of the aforementioned devices,

City "Good Neighbor" Policy	Project Consistency
	including or live or recorded music, shall cease between the hours of 10:00 p.m. and 7:00 a.m. if the sound therefrom creates a noise disturbance across the property line of a residential use."
5. Idling of trucks queued or operated on site shall not exceed five minutes.	**Consistent.** MM-AQ-17 limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use.
6. Where transport by temperature-controlled trucks or trailers is proposed, on-site electrical hookups shall be provided at loading docks. Idling or use of auxiliary truck engine power to power climate-control equipment shall be prohibited.	**Consistent.** Section 4.4.2 of the Specific Plan requires loading bays that are utilized by refrigerated trailers to have dock seals and be equipped with plug-in electrical outlets. In addition, MM-AQ-8 requires that all TRU loading docks provide electrical hookups and all loading docks are designed to be compatible with SmartWay trucks.
7. Warehousing and distribution facilities generating 150 or more truck trips per day, as determined by the most recent Institute of Transportation Engineers (ITE) Trip Generation Rate for the specific proposed land use, shall prepare a Health Risk Assessment in accordance with South Coast Air Quality Management District (SCAQMD) Guidelines.	**Consistent.** A Health Risk Assessment has been prepared in accordance with SCAQMD standards and determined the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. See Appendix C-2 of the EIR.

WRCOG Good Neighbor Guidelines

A number of comments questioned the Project's consistency with WRCOG's Good Neighbor Guidelines for Siting New and/or Modified Industrial Facilities dated September 12, 2005. The following table includes an analysis of the Project's consistency with WRCOG's Good Neighbor Guidelines.

WRCOG Goal	Project Consistency
Goal 1: Minimize exposure to diesel emissions to neighbors that are situated in close proximity to the warehouse/distribution center. • Create buffer zone of at least 300 meters (roughly 1,000 feet, can be office space, employee parking, greenbelt) between warehouse/distribution center and sensitive receptors (housing, schools, daycare centers, playground, hospitals, youth centers, elderly care facilities, etc.); • Site design shall allow for trucks to check-in within facility area to prevent queuing of trucks outside of facility; • Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points; • Design warehouse/distribution center so that interior vehicular circulation shall be located away from residential uses or any other sensitive receptors.	**Consistent**. Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. Industrial buildings must be set back a minimum of 1,000 feet from residential. In addition, any industrial-use building will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 3.5.4, Off-Street Loading Facilities, and Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan require truck courts and loading docks to be oriented away or screened to reduce visibility public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties, and prohibits loading and unloading

WRCOG Goal	Project Consistency
	activities within view of public streets or residential land uses. Section 3.5.4, Off-Street Loading Facilities, requires loading or unloading facilities to be sized and located so that they do not require trucks to be located in required front or street side yards during loading and unloading activities, ensuring trucks do not spill onto surrounding public streets. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue.
Goal 2: Eliminate diesel trucks from unnecessarily traversing through residential neighborhoods. • Require warehouse/distribution centers to clearly specify on the facility site plan primary entrance and exit points; • Require warehouse/distribution centers to establish specific truck routes and post signage between the warehouse/distribution center and the freeway and/or primary access arterial that achieves the objective. The jurisdiction may not have an established truck route, but may take the opportunity to consider the development of one; • Provide food options, fueling, truck repair and or convenience store on-site or within the warehouse/distribution center complex; • Require warehouse/distribution centers to provide signage or flyers identifying where food, lodging, and entertainment can be found, when it is not available on site.	**Consistent**. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. MM-AQ-15 requires signage clearly identifying the approved truck routes. PDF-TRA-2 will amend the existing March JPA truck routes. MM-AQ-9 requires industrial facilities 400,000 square feet or larger to include a truck operator lounge equipped with clean and accessible amenities, such as restrooms, vending machines, television, and air conditioning. MM-AQ-21 requires tenants to join or implement a transportation demand management program, including offering shuttle service to and from commercial areas/food establishments or establish onsite locations for food or catering trucks service.
Goal 3: Eliminate trucks from using residential areas and repairing vehicles on the streets. • Allow homeowners in the trucking business to acquire permits to park vehicles on property, residential areas or streets; • Establish overnight parking within the warehouse/distribution center; • Allow warehouse/distribution facilities to establish an area within the facility for repairs.	**Consistent**. Section 3.5.4, Off-Street Loading Facilities, requires loading or unloading facilities to be sized and located so that they do not require trucks to be located in required front or street side yards during loading and unloading activities, ensuring trucks do not spill onto surrounding public streets.
Goal 4: Reduce and/or eliminate diesel idling within the warehouse/distribution center. • Require the installation of electric hook-ups to eliminate idling of main and auxiliary engines during loading and unloading, and when trucks are not in use;	**Consistent**. MM-AQ-8 requires that all TRU loading docks provide electrical hookups and all loading docks are designed to be compatible with SmartWay trucks. MM-AQ-22 requires the facility operator to provide information to all tenants, with instructions that the information shall be

WRCOG Goal	Project Consistency
• Train warehouse managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks within the facility; • Require signage that informs truck drivers of the California Air Resources Board (CARB) regulations (which include anti-idling regulations); • Post signs requesting that truck drivers turn-off engines when not in use; • Restrict idling within the facility to less than ten (10) minutes.	provided to employees and truck drivers as appropriate, regarding efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. MM-AQ-17 requires legible, durable, weather-proof signs placed at truck access gates, loading docks, and truck parking areas that identify: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than three (3) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager, South Coast Air Quality Management District and the California Air Resources Board to report violations. One six square foot sign providing this information shall be located on the building between every two dock-high doors and the sign shall be posted in highly visible locations at the entrance gates, semi parking areas, and trailer parking locations.
Goal 5: Establish a diesel minimization plan for on- and off-road diesel mobile sources to be implemented with new projects. • Encourage warehouse/distribution center fleet owners to replace their existing diesel fleets with new model vehicles and/or cleaner technologies, such as electric or compressed natural gas; • Require all warehouse/distribution centers to operate the cleanest vehicles available; • Provide incentives for warehouses/distribution centers and corporations which partner with trucking companies that operate the cleanest vehicles available; • Encourage the installation of clean fuel fueling stations at facilities.	**Consistent**. MM-AQ-19 requires tenants be provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment. MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-11 requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available.

WRCOG Goal	Project Consistency
Goal 6: Establish an education program to inform truck drivers of the health effects of diesel particulate and the importance of reducing their idling time. • Provide warehouse/distribution center owners/managers with informational flyers and pamphlets for truck drivers about the health effects of diesel particulates and the importance of being a good neighbor. The following information should include: o Health effects of diesel particulates; o Benefits of minimizing idling time; o ARB idling regulations; o Importance of not parking in residential areas.	**Consistent.** MM-AQ-22 requires tenants provide information to employees and truck drivers on: Building energy efficiency, solid waste reduction, recycling, and water conservation; Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting; Participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies; Health effects of diesel particulates, state regulations limiting truck idling time, and the benefits of minimized idling; The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity; Efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
Goal 7: Establish a public outreach program and conduct periodic community meetings to address issues from neighbors. • Encourage facility owners/management to conduct periodic community meetings inviting neighbors, community groups, and other organizations; • Encourage facility owners/management to have site visits with neighbors and members of the community to view measures that the facility has taken to reduce/and or eliminate diesel particulate emissions; • Encourage facility owners/management to coordinate an outreach program that will educate the public and encourage discussion relating to the potential for cumulative impacts from a new warehouse/distribution center. • Provide facility owners/management with the necessary resources and encourage the utilization of those resources such as, the California Air Resources Board (ARB) and the South Coast Air Quality Management District regarding information about the types and amounts of air pollution emitted in an area, regional air quality concentrations, and health risks estimates for specific sources; • Require the posting of signs outside of the facility providing a phone number where neighbors can call if there is an air quality issue.	**Consistent.** MM-AQ-16 requires signage with contact information for the tenant representative, March JPA, County of Riverside, and SCAQMD for complaints about excessive noise, dust, fumes, odors, and perceived Code violations. MM-AQ-17 requires legible, durable, weather-proof signs placed at truck access gates, loading docks, and truck parking areas that identify telephone numbers of the building facilities manager, South Coast Air Quality Management District and the California Air Resources Board to report violations.

2003 Settlement Agreement with Center for Community Action and Environmental Justice and Community Alliance for Riverside's Economy & Environment

A number of comments questioned the Project's consistency with the 2003 Settlement Agreement with CCAEJ and CAREE. Subsequent to the adoption of the 1999 March JPA General Plan, a Settlement Agreement was entered into by, between, and among March JPA, the Center for Community Action and Environmental Justice (CCAEJ),

Community Alliance for Riverside's Economy & Environment (CAREE), and LNR Riverside, LLC (Developer). In March 2003, CCAEJ and CAREE filed legal action challenging March JPA's approval of a General Plan Amendment, Specific Plan Amendment, Tentative Tract Map, and March JPA's certification of the March Business Center Final Focused EIR for the development of 1,290 acres known as the March Business Center (now known as Meridian Business Center). Pursuant to a Memorandum of Understanding entered into by all involved, in August 2003, a Settlement Agreement was established for the dismissal of challenges to the 2003 Project and allowed for the development of the Project consistent with the objectives of March JPA.

The 2003 Settlement Agreement specifically focused on the North Campus and South Campus portions of the March Business Center. The Settlement Agreement established terms for the buildout of these two campuses within the March Business Center and did not apply to the development of the proposed Project on the West Campus Upper Plateau site. The Table below details the Project's consistency with the 2003 Settlement Agreement's settlement terms (Section 2).

2003 Settlement Agreement	Project Consistency
2.1 – Reduction in Semi-Truck Emissions	
2.1.1 All semi trucks to use only low sulfur fuel after 2006, reducing particulate emissions by 15%, as required by the State of California. 2.1.2 All new semi-trucks registered within the state of California shall have particulate traps for model years 2006 and after, as required by the State of California (85% reduction in particulates). 2.1.3 All new semi-trucks sold in the United States to have reduced PM emissions through use of particulate traps starting in 2007 as required by the U.S. EPA (85% reduction in particulates).	**Consistent**. MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
2.1.4 March JPA to research and prepare an ordinance for limited semi truck idling time to include posting of signs and levying of fines for all semi trucks within March Joint Powers Authority.	**Consistent.** MM-AQ-17 limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use. MM-AQ-17 requires signage detailing the telephone numbers of the building facilities manager, South Coast Air Quality Management District and the California Air Resources Board to report violations. MM-AQ-16 requires signage with contact information for the tenant representative, March JPA, County of Riverside, and SCAQMD for complaints about excessive noise, dust, fumes, odors, and perceived Code violations.
2.2 Business Park to facilitate use of Bio Diesel and Alternate Fuels	
2.2.1 March JPA and Developer to cooperate and partner with AQMD to encourage bio diesel, propane and CNG/LNG use within the Project. 2.2 .2 March JPA and Developer to pursue Carl Moyer Grants to assist businesses in using new technology for clean burning vehicles.	**Consistent.** MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean

2003 Settlement Agreement	Project Consistency
2.2.3 March JPA and Developer will pursue Carl Moyer Grants specifically for '95 and newer semi-trucks within Logistic Warehouse fleets to modify semi-trucks to clean burning vehicles by use of particulate traps, CNG/LNG, bio diesel or other emerging clean air technology. 2.2.4 March JPA and Developer to pursue natural gas and bio diesel fueling infrastructure within the Project or within the March Joint Powers Authority within 6 months of the issuance of the certificate of occupancy for the first Logistic Warehouse. To facilitate development of the facility, March JPA and Developer will explore use of public incentive funding available through California Mobile Source Reduction Committee and AQMD Clean Fuels Funding. 2.2.5 Developer shall cause to be developed a low-sulfur fueling facility within the Project or within the March Joint Powers Authority within six months of the issuance of the certificate of occupancy for the first Logistic Warehouse. Incentives are to be provided by Developer to bring low sulfur fuel prices to non-clean market levels through voucher and/or validation system for Project Logistic Warehouse facilities. Low-sulfur fuel to be available for all other users, including through-traffic on 1-215, however incentives are not required by Developer to subsidize other users. 2.2.6 Developer will use best efforts to encourage the low bidders to utilize clean burning bio-diesel and/or low sulfur diesel fuel for grading and earthmoving equipment during the mass grading process.	fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. PDF-GHG-1 requires conduit to be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. MM-AQ-11 requires main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. MM-AQ-18 requires tenants utilize electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. MM-AQ-14 requires tenants utilize electric or battery-operated equipment for landscape maintenance. MM-AQ-19 requires tenants to be provided with information on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment. PDF-AQ-1 prohibits the use of natural gas by Specific Plan Area development. MM-AQ-25 requires the facility operator monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable. MM-AQ-3 requires the construction contractor to use heavy-duty hauling trucks that are model year 2014 or later and to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible. MM-AQ-3 further requires the designation of an area where electric-powered construction vehicles and equipment can be charged.

2003 Settlement Agreement	Project Consistency
2.3 Assure attractive development and views from Orangecrest	
2.3.1 March JPA shall adopt architectural design guidelines for all development within the Project. The draft architectural design guidelines shall be routed to CAREE representatives for review and comment prior to placing the final guidelines on the Joint Powers Commission agenda for consideration and approval. 2.3.2 March JPA shall require a 15' landscape buffer on Project development between the existing Orangecrest residential neighborhood and the Project within the north campus. 2.3.3 March JPA shall prepare a resolution for the appointment of Frank Schiavone to the March Business Center Implementation Committee and such resolution to the Joint Powers Commission for consideration and approval.	**Consistent.** Chapter 4 of the Project Specific Plan sets forth the Design Guidelines and Standards, providing the site planning, landscaping, and architectural theme within the West Campus Upper Plateau Specific Plan and guidelines on architectural design, landscape design, streetscapes, walls and fencing, and signage. The Specific Plan Area includes a 30-foot buffer of open space between the Campus Development and the Conservation Easement. Figure 4-19 of the Project Specific Plan provides details of the landscape interface to the south of the Specific Plan Area. Figure 4-17 provides details of the landscape interface to the north of the Specific Plan Area. Term 2.3.3 is not applicable to the Project.
2.4 Land Use Provisions	
2.4.1 Parties agree that in order to effectuate land use objectives, that Developer will analyze the potential of shifting approximately 16 acres within the north campus from the west side of "Z" Street to the east side of "Z" Street, with the acreage to be shifted primarily from lots 54, 55 and 56. 2.4.2 Parties agree that no land use meeting the description of Logistics Warehouse, will be developed on lots 54, 55 and 56 as identified in the Approvals, or within the Industrial area west of "Z" street if these lots are modified to realign "Z" Street. 2.4.3 Parties agree that any logistic facilities located in the south campus shall first occur on lots 78, 79, 80, and 81 as identified in the approved Tentative Map. 2.4.4 Parties agree that it is assumed that lots 16, 17 and 18 within the south campus will not be developed for Logistic Warehouses. If circumstances do not allow non-Logistic Warehouses to develop on lots 16, 17, and 18, Developer may pursue the use of these lots for Logistic Warehouse uses, subject to these uses being approved at a public hearing of March JPA, and subject to the Logistic Warehouses incorporating clean fuel fleets.	**Not Applicable.** These provisions apply to specific lots within the North and South Campuses of the Meridian Business Center. Regarding clean fuel fleets, MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later.
2.5 Limit trucks on Van Buren and Alessandro Boulevard (to the extent that it is within the power of these Parties to do so, as to Alessandro Boulevard).	
2.5.1 Developer shall create a truck route plan to require all truck traffic to travel within the development directly east to 1-215.	**Consistent.** As stated in PDF-TRA-2, the Project will amend the existing March JPA truck routes along Brown Street to Cactus Avenue, and Cactus Avenue west from Meridian Parkway. Internal Project roadways of Linebacker Drive, Arclight Drive, Bunker Hill Drive, and Airman Drive will also be

2003 Settlement Agreement	Project Consistency
	truck routes. Trucks are prohibited from turning left on Brown Street to access Alessandro Boulevard. No truck access is permitted along Barton Street. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The Project will comply with the March JPA's approved truck route ordinance. MM-AQ-15 requires signs clearly identifying the approved truck routes be installed along the truck routes to and from the project site and within the project site.
2.5.2 Developer and Authority shall post truck route signs along JPA roads to discourage use of Van Buren Boulevard and Alessandro (to the extent that it is within the power of these Parties to do so, as to Alessandro) as a truck route.	**Consistent.** MM-AQ-15 requires signs clearly identifying the approved truck routes installed along the truck routes to and from the Project site and within the Project site.
2.5.3 Developer shall construct physical constraints within March JPA to prohibit truck movements heading west on Van Buren Boulevard but permitting cars, subject to March JPA approval.	**Not Applicable.** The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway.
2.5.4 March JPA shall require approval of Traffic Demand Management plan for each business to include posting of the approved truck route plan within all businesses and prohibition of through truck traffic west of Barton on Van Buren and Alessandro (to the extent that it is within the power of these Parties to do so, as to Alessandro).	**Consistent.** MM-AQ-15 requires signs clearly identifying the approved truck routes installed along the truck routes to and from the Project site and within the Project site. Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, MM-AQ-21 requires each facility to implement or join a transportation demand management program, which would include: • Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees.

2003 Settlement Agreement	Project Consistency
	• Create and maintain a "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work. • Inform employees of public transit and commuting services available to them (e.g., social media, signage). • Provide on-site transit pass sales and discounted transit passes. • Guarantee a ride home. • Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees. • Designating areas for employee pickup and drop-off. • Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.
2.5.5 March JPA shall work with Assemblyman Benoit's office, City of Riverside officials, County of Riverside officials and other appropriate agencies to redesignate Van Buren Boulevard and Alessandro Boulevard (to the extent that it is within the power of these Parties to do so, as to Alessandro) west of the March JPA planning area for no through truck traffic.	**Consistent.** Truck route enforcement will be implemented through the March JPA Truck Route Ordinance.
2.6 Provide Public Amenities	
2.6.1 March JPA shall provide for active recreation in the form of a community park. The park is to consist of 48-acres initially with potential expansion to 60-acres ("Park"). 2.6.2 Specific use of the Park shall be for softball, soccer or football fields for youth or adult recreation or other appropriate uses as determined through a parks feasibility study.	**Consistent.** The Project includes a 60.28-acre parcel for park purposes. As Recirculated Chapter 3, Project Description, explained, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with off-site utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete.
2.6.3 March JPA and Developer to provide site for Riverside County Fire station.	**Consistent.** The applicant previously dedicated a 2.12-acre parcel at the northeast corner of Meridian Parkway and Opportunity Way to the County of Riverside. As discussed in more detail in Recirculated Chapter 3, Project Description, and Topical Response 6 – Meridian Fire Station, the

2003 Settlement Agreement	Project Consistency
	proposed Development Agreement includes the construction of the Meridian Fire Station as a Community Benefit.
2.6.4 March JPA and Developer to provide site for City of Riverside Police substation.	**Consistent.** The applicant dedicated a site to the City of Riverside for a Police Station at Barton Road in Meridian South Campus, which the City of Riverside then relinquished back.

2012 Settlement Agreement with Center for Biological Diversity and San Bernardino Valley Audubon Society

A number of comments questioned the Project's consistency with the 2012 Settlement Agreement with CBD. Adopted in 1996, designated areas of the March AFB, including the Project site, were designated as the Sycamore Canyon-March Core Reserve by the Stephens' kangaroo rat (SKR) habitat conservation plan (HCP). The SKR HCP also contemplated the release of some of this land for development. Subsequent to the decision to realign March AFB, a strategy was developed to trade March SKR habitat in exchange for purchasing SKR habitat elsewhere in Western Riverside County in order to take full advantage of the economic redevelopment potential afforded by the March surplus lands. In 2009, the Center for Biological Diversity and San Bernardino Valley Audubon Society brought a lawsuit challenging the trade out of March land, including the Project site, in exchange for land in Potrero Valley. The parties executed a settlement agreement in 2012 (CBD Settlement Agreement). The CBD Settlement Agreement covers development within the Project site.

The Table below details the Project's consistency with the settlement terms of the CBD Settlement Agreement (Section B – agreement language abridged for ease of review).

2012 CBD Settlement Agreement	Project Consistency
1. Defendant-Intervenors agree to place into conservation those portions of the March SKR Management Area/March Air Force Base west campus depicted as "Conservation Easement" or "Water Quality Open Space Area" on the map attached hereto as Exhibit A (approximately 649 acres) to be managed for their wildlife habitat value for sensitive species.	**Consistent.** In 2014, March JPA placed the southern 141.237 acres (located north of Van Buren Boulevard) under a conservation easement currently managed by the Rivers and Lands Conservancy. Under this Project, approximately 445.43 acres of undisturbed land surrounding the Specific Plan Area, referred to as the Conservation Easement, would be placed under a conservation easement. For informational purposes, in order to provide the minimum 649 acres of conservation area, the Applicant and March JPA identified an additional 87.7 acres of open space available for the dedication of a Conservation Easement located between the Project site's southern boundary and Van Buren Boulevard that was not included in the 2014 open space dedication. This is occurring as a separate action and not part of this Project. The Management Entity for the Conservation Easement would meet the criteria outlined in the CBD Settlement Agreement.
a. The Parties acknowledge that there are many existing service roads within the Conservation Areas. The Parties agree that any currently existing service roads within the Conservation Areas, as depicted by the red lines in Exhibit A, can continue to be utilized by the public for	**Consistent.** The Project includes a 445.43-acre Conservation Easement with existing trails for passive recreational use.

2012 CBD Settlement Agreement	Project Consistency
passive recreation. Passive recreation means recreational uses where very minimum alteration of vegetation, topography or other native features are necessary for the enjoyment of the site amenities, such as hiking, nature observation, picnicking, non-motorized recreation, and archaeological or historic preservation.	
b. Vehicular access on the existing service roads shall not be open to the general public.	**Consistent.** Vehicular access by the general public is prohibited within the Conservation Easement area.
c. Public Access shall be limited to reduce the impacts to sensitive species and habitat in the Conservation Areas. Mechanisms to reduce the impacts of passive recreation and public access in the Conservation Area include, but are not limited to, fencing, signage to prevent off-road or off-trail use and night access, and leash requirements for any dogs allowed in the Conservation Area.	**Consistent.** March JPA continues to manage the Conservation Easement area in conformance with the CBD Settlement Agreement.
2. Portions of the March SKR Management Area/March Air Force Base west campus can be developed by the Defendant-Intervenors, as depicted in the Developable Area in Exhibit A. The Developable Area includes the roadways depicted on Exhibit A. Any temporary impact to areas adjacent to the Developable Area shall be restored by Developer to provide habitat for sensitive species.	**Consistent.** The Specific Plan Area of the Project overlaps the Developable Area set forth in the CBD Settlement Agreement. To prevent inadvertent disturbance to areas outside the limits of work, MM-BIO-1 requires the construction limits to be clearly demarcated and maintained throughout Project construction. MM-BIO-3 requires the restoration of temporary impacts.
3. Portions of the March SKR Management Area/March Air Force Base west campus will be dedicated as parkland or open space for active recreational use, as depicted in Exhibit A ("Proposed Park Area").	**Consistent.** The Project includes a 60-acre proposed Park for active recreational use.
4. Defendant-Intervenors shall, at their sole discretion, select an appropriate land management entity or entities to manage the SKR Conservation Area ("Management Entity"), with input from the Plaintiffs.	**Consistent.** The Project includes placing 445.43 acres under a conservation easement to be managed for its habitat values.
5. The Parties acknowledge there are certain "blanket" easements across the Conservation Areas for items such as utilities that were retained or granted by the United States government which are not affected by this Agreement.	**Consistent.** The Project does not propose any interference with any blanket easements.
6. March JPA agrees that all mitigation measures attached as Exhibit B shall be required for any development in the Developable Area.	**Consistent.** The mitigation measures listed in the CBD Settlement Agreement have been incorporated into the Project Specific Plan, Project design features, the EIR mitigation measures, and the conditions of approval.
7. Developer agrees to make an initial contribution by December 31, 2012, of $500,000 toward a total non-wasting endowment of $2 million to be used for management and monitoring activities undertaken by the Management Entity in the Conservation Areas ("Endowment"). Developer agrees that the non-wasting Endowment will be fully funded at a level of $2 million before the last grading permit for the Development Area is issued or April I, 2027, whichever is earlier.	**Consistent.** March JPA maintains an endowment fund where payments in conformance with the CBD Settlement Agreement have been deposited.

2012 CBD Settlement Agreement	Project Consistency
8. Defendant-Intervenors agree not to develop, grade, de-vegetate, or destroy a riparian area of approximately 2-3 acres located on the Conservation Areas or Proposed Park Area as depicted in Exhibit A ("Riparian Area").	**Consistent.** The Riparian Area is within the proposed Conservation Easement area.
9. Defendant-Intervenors agree to abide by the Urban/Wildland Interface requirements, as set forth in Section 6.1.4 of the Western Riverside County Multiple Species Habitat Conservation Plan ("MSHCP") and agree that the Conservation Areas referenced in this agreement will be treated as if they are a MSHCP Conservation Area for purposes of application of the Urban/Wildland Interface requirements. In particular the Parties agree to implement the requirements of Section 6.1.4 including, but not limited to, noise, drainage, barriers and lighting.	**Consistent.** The provisions of Section 6.1.4 of the MSHCP have been incorporated into the Project Specific Plan, Project design features, the EIR mitigation measures, and the conditions of approval.
a. Defendant-Intervenors agree that Brown Street, and in particular the intersection of Brown Street and Alessandro Boulevard, will be designed to minimize impacts to wildlife movement from the neighboring Sycamore Canyon Wilderness Park. Such mitigation measures will include, but are not limited to, the following: reductions in night lighting within and adjacent to the Conservation Areas while still complying with County minimum street light requirements; fencing to reduce public access and allow wildlife movement; and signs to reduce trespass and inform the public of the sensitive nature of the areas.	**Consistent.** The Project proposes to include a wildlife crossing under Brown Street. Additionally, the lighting, fencing, and signage measures have been incorporated into the Project Specific Plan, Project design features, the EIR mitigation measures, and the conditions of approval.
12. Defendant-Intervenors agree that the existing Cactus Avenue, as depicted on Exhibit A, will be the only road bisecting the Conservation Areas in the March SKR Management Area/March Air Force Base west campus to connect the existing and future Meridian development in the vicinity of Plummer Street with the future Meridian West Campus. Other anticipated infrastructure that has the potential to impact the Conservation Areas described in this Agreement is listed on Exhibit A.	**Consistent**. Cactus Avenue is the only roadway proposed to bisect the Conservation Easement. Two wildlife crossings will be constructed beneath the Cactus Avenue roadway extension to facilitate wildlife passage from the north and south side of the new roadway extension. Another wildlife crossing will be constructed under the Brown Street extension.
13. Defendant-Intervenors agree that soft-bottomed culverts will be installed beneath any future modifications to Cactus Avenue to allow for animal passage underneath Cactus Avenue. The dimensions of such culverts shall be approximately 6 feet in height by 20 feet in width to allow for adequate passage of animals north-south through the Conservation Areas.	**Consistent.** The Project proposed three wildlife crossing culverts: 2 under Cactus Avenue and 1 under Brown Street.

9.1.5 Topical Response 5 - Jobs

This topical response addresses various comments received on the EIR related to the number of jobs anticipated to be created by the Project as well as the types of jobs and whether or not there is a need for these jobs, so as not to be repeated in each individual response, but rather cross-referenced in individual letter responses where applicable.

Draft EIR Estimate

The Draft EIR utilizes the Project jobs estimate of 2,595 employees used by Western Municipal Water District (WMWD) in its Water Supply Assessment (Appendix O) for the Project. This jobs estimate was developed by the March JPA and represents on-site employees that will impact water demand for the Project.

March JPA Economic Impact Data

To evaluate the regional economic effects of March JPA development projects as of March 2023 and project their impacts in a fully-built-out scenario by 2040, March JPA commissioned Dr. Qisheng Pan to prepare an "Economic Impact Analysis of the March Joint Powers Authority (MJPA) Development Projects" (March EIA; Final EIR Appendix U). The intent of the March EIA is to provide an update to the JPA Commissioners about the economic conditions for the entire JPA Planning Area. Table 1 of the March EIA presents 2023 employment data for the various existing developments within the March JPA Planning Area. The data includes each business, its location, square footage, total jobs, and business type (NAICS Code). The employment numbers include ancillary jobs, such as truck drivers.[1] A square footage to job ratio similar to the Project uses was developed using this 2023 March JPA economic impact data and removing the following entries:

- Businesses and buildings listed as vacant or without jobs
- Business types that would be prohibited under the West Campus Upper Plateau Specific Plan
- March Inland Port Airport development

A March JPA economic impact ratio was derived based on the above-referenced economic analysis. The March JPA economic ratio is 1,486 square feet per job (see worksheets attached as Final EIR Appendix T). Using this ratio, the Project would be estimated to generate a total of 3,357 jobs. Unlike the March JPA 2023 employment data, the Project on-site employee estimate does not include ancillary jobs. The Project would generate ancillary jobs for truck drivers and Table 4-2 of the West Campus Upper Plateau Traffic Analysis (Appendix N-2) indicates the Project would generate 2,054 truck trips (which is 1,027 trucks coming and going to the site) which equates to approximately 1,027 truck drivers. When the Project's estimated truck drivers (1,027) are added to the Project's estimated on-site employees (2,595), the Project has an estimate of 3,622 total jobs generated. The Project's combined jobs estimate of 3,622 conservatively exceeds the March JPA employment ratio estimate (of 3,357) by only 8%, or 265 jobs. This revised number does not change the conclusions in the EIR.

Thus, the 2023 March JPA economic impact data substantiates the WMWD WSA and EIR's on-site employment estimate for the Project.

Several comments raised concerns about employment projections and the effects of future automation on the workforce, particularly for warehouses. While existing warehouse automation would be accounted for in the March EIA, at this time, is too speculative to assume future automation and/or incorporate such unknown factors into the EIR. As stated above, the Draft EIR assumed the total on-site employment from the proposed Project based on the on-site employment data estimated by March JPA and used in the Water Supply Assessment (Appendix O in the EIR), as

[1] Email Comm. Dr. Grace Martin, March JPA Executive Director 6/7/23.

well as ancillary jobs derived from truck drivers serving Project operations. The Draft EIR's jobs estimate represents a conservative approach to assess associated environmental impacts if there were a future reduction in jobs.

Unemployment Projections

CEQA Guidelines Section 15125(a) states that an EIR must include a description of the physical environmental conditions in the vicinity of the project and that this environmental setting will normally constitute the baseline physical conditions. CEQA Guidelines Section 15125(a)(1) states that generally, the lead agency should describe the physical environmental conditions as they exist at the time the notice of preparation is published. This section of the CEQA Guidelines further states that "where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions…".

The Draft EIR analyzed employment impacts utilizing 2019 unemployment data. As explained in Section 4.12, Population and Housing, of the EIR, "Given the fact that unemployment rates during the COVID pandemic may be skewed when compared to previous years, the 2019 rates were also evaluated". As stated in the EIR, "According to the U.S. Census Bureau, 5.8% of Riverside County's working age civilian population (16 years and over) were unemployed in 2019 compared to 5.9% in San Bernardino County, 5.0% in Los Angeles County, 4.1% in Orange County, and 5.6% in San Diego County." The U.S. Census utilized 1-year estimates for employment status (U.S. Census 2019).

Unemployment rates fluctuate on a monthly basis. The NOP for the proposed Project was published on November 19, 2021 According to the California Employment Development Department's Labor Market Information Division, the civilian labor force unemployment rate in November 2021 in Riverside County was 5.4% and the annual average unemployment rate for 2021 was 7.3%. In 2021 and 2022, the unemployment rate in Riverside County has been as low as 3.4% (May 2022) and as high as 8.9% (January 2021). Given this, the estimated unemployment rate of 5.8% (or 111,788 people) utilized in the Draft EIR is nearly identical to the average unemployment rate in 2021 and 2022, which would be 5.75%, and is well within the range of variation experienced during the pre- and post-COVID pandemic era.

Several comments challenged the Draft EIR's determination that the Project's estimated jobs would be filled regionally by existing residents. While the Draft EIR cites past (to account for labor changes during the COVID pandemic) and existing data for employment and unemployment as allowed under CEQA Guidelines Section 15125(a)(1), Project buildout would occur over an approximately 5-year horizon. The employment growth projections (i.e., forecasts) utilized within the EIR are provided by each local jurisdiction (e.g., Riverside County, City of Riverside, City of Moreno Valley, City of Perris) to the Southern California Association of Governments (SCAG) and based on the anticipated growth in population in Riverside County during the near-term (projected increase of 360,000 new County residents by 2030) and long-term (projected increase of 759,000 new County residents by 2045). As such, additional jobs will be needed to continue to provide employment opportunities for future residents of Riverside County. The EIR cites SCAG data in which, "48.6% of residents within unincorporated Riverside County work and live in the County, while 51.4% commute outside of the County (SCAG 2019b)" SCAG identified similar trends for Riverside County as a whole (inclusive of the incorporated and unincorporated areas). Approximately 48.0% work and live in Riverside County, while 52.0% commute to other places (SCAG 2019a). Further, as discussed in the General Plan, March JPA was formed to create jobs within this portion of Riverside County as part of the March Air Reserve Base realignment. Therefore, it is reasonable to assume the jobs generated by the Project could be filled with existing local residents residing within the County, either from the unemployed population or residents looking to reduce their commutes.

Additionally, using CalEnviroScreen 4.0,[2] the surrounding census tracts have an average unemployment rate of 9%, further supporting the EIR's determination that the Project's jobs would be filled locally. See Table TR6-1, below.

Table TR6-1. Unemployment Rates for Area Census Tracts

Census Tract	Area	Unemployment	CalEnviroScreen percentile[1]
6065046700	Project site March JPA March ARB	9%	81
6065042013	Orangecrest	6%	58
6065042014	Orangecrest	3%	23
6065042012	Mission Grove	6%	53
6065042009	Mead Valley	12%	91
6065042010	Mead Valley	6%	61
6065050900	Sycamore Canyon	5%	44
6065042505	Edgemont	17%	98
6065042506	Edgemont	8%	77
6065042512	Moreno Valley	8%	77
6065042511	Moreno Valley	15%	96
6065042510	Moreno Valley	14%	96
6065042508	Moreno Valley	6%	55
6065042507	Moreno Valley	17%	98
6065048800	Moreno Valley	10%	85
6065042620	Perris	3%	16

Source: https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/page/Indicators/?data_id=widget_328_output_0%3A0%2CdataSource_45-17c3dd28756-layer-5%3A3952&views=Unemployment

March JPA recognizes the difficulty in identifying existing conditions for population, housing, and employment. As further detailed in Recirculated Chapter 3, Project Description, the Project site is located within an unincorporated area of Riverside County and surrounded by March JPA's member agencies: the County of Riverside and the cities of Riverside, Moreno Valley, and Perris. Population, housing, and employment patterns are disproportionately located within the western region of the County. Thus, solely utilizing unincorporated data for existing and projected conditions would not adequately capture the nature of the employment within the vicinity of the Project site. Similarly, an assessment of each of March JPA's member agencies would not adequately capture existing employment estimates and projections within the unincorporated areas adjacent to the Project site, within and outside of the March JPA Planning area. As such, the Draft EIR utilizes regional data sets as a comparison for impacts related to population growth due to the regional nature of the Project. Therefore, this determination represents a conservative approach in assessing the Project's potential impacts throughout the EIR.

Salary and Housing Information

March JPA received comments raising concerns about potential salaries for Project jobs and local housing costs. According to the California Employment Development Department (EDD), for the third quarter of 2023, the average weekly pay in the Transportation and Warehousing sector in Riverside County was $1,076, or $55,952 annually.[3]

[2] Produced by the California Office of Environmental Health Hazard Assessment and analyzes various pollution burden data with population characteristics and assigns a score to each census tract relative to other census tracts.

[3] https://labormarketinfo.edd.ca.gov/qcew/CEW-Detail_NAICS.asp?MajorIndustryCode=1021&GeoCode=06000065&Year=2023&OwnCode=50&Qtr=03

Using U.S. Census data,[4] Table TR6-2 provides the median home price and gross rent (not limited to 1-bedroom apartments) for the zip codes adjacent to March ARB.

Table TR6-2 Housing Costs Adjacent to March ARB

Zip Code	Area	Median Home Price	Gross Rent
92553	Moreno Valley – north of March ARB, east of I-215	$371,600	$1,759
92551	Moreno Valley – east of March ARB	$391,200	$1,867
92570	Perris – south of March ARB, west of I-215	$376,300	$1,354
92571	Perris – south of March ARB, east of I-215	$382,500	$1,830
92508	Orangecrest, Mission Grove, Riverside	$633,900	$2,511

The U.S. Department of Housing and Urban Development considers housing to be affordable when a household spends 30% or less of its income on housing costs. Using the EDD data, 30% of a Riverside County warehouse worker's salary would be $1,398.80, which would be in excess of the gross rent for housing in Perris (zip code 92570).

[4] https://data.census.gov/

9.1.6 Topical Response 6 – Meridian Fire Station

This topical response is focused specifically on the provision of the planned fire station within the March JPA Planning Area. As detailed in Recirculated Chapter 3, Project Description, the Development Agreement for the proposed Project includes the construction of the Meridian Fire Station as a Community Benefit. As discussed in the Draft EIR, the Meridian Fire Station's construction and operation is not required to serve the proposed Project, and environmental analysis for the development and operation of the Fire Station was adopted by March JPA in 2010, through the Subsequent EIR (SEIR) the Meridian Specific Plan (SCH#2009071069). This topical response elaborates on the background and previously conducted analysis for this Fire Station.

Previous Environmental Evaluation of the Meridian Fire Station

Following the establishment of March JPA and the adoption of March JPA's General Plan in 1999, the March Business Center Specific Plan was prepared and adopted in 2003. The March JPA certified a Focused EIR as part of the approval of the March Business Center Specific Plan. The March Business Center Specific Plan identified two campuses: North Campus and South Campus, separated by Van Buren Boulevard. The 2003 Focused EIR identified the need for an additional fire station and included Mitigation Measure P-2. Mitigation Measure P-2 states, "The developer shall dedicate land within the proposed Project for a future fire station. The March JPA will develop a financing plan to fund the station." On May 21, 2003, March JPA adopted Ordinance #JPA-03-02, approving fire development impact fees to fund the Meridian Fire Station.

In April 2010, the March JPA certified a Subsequent EIR (SEIR) to the 2003 Focused EIR that included, in part, environmental analysis associated with the construction and operation of the fire station, referred to as the Meridian Fire Station. The SEIR also evaluated changes in land use designations, changes in lot layout, site access, and internal circulation, types of development within the March Business Center Specific Plan area, development of Lot 16, and changes in Specific Plan development regulations. The SEIR focused solely on the North Campus area of the March Business Center Specific Plan.

Specifically, beginning on Page III-22, the SEIR noted that the Riverside County Fire Department planned to develop the Meridian Fire Station on a 2.12-acre site located at the northeast corner of Meridian Parkway and Opportunity Way, as shown in the attached Figure TR6-1. The Meridian Fire Station would serve the JPA Planning Area and surrounding development, and the developer's dedication of land satisfied 2003 Focused EIR Mitigation Measure P-2. The SEIR disclosed that the exact construction date for the Meridian Fire Station was not known at the time of preparing the SEIR; however, the JPA's stated intent was to ensure that potential impacts from the construction and operation of the Meridian Fire Station were included in the SEIR.

The 2010 SEIR described the Meridian Fire Station as a Heavy Urban Station, which "are typically staffed by a maximum of 16 people and have approximately 10,000 square feet of interior space, which includes living areas, offices, and a lobby. Living space for a Heavy Urban Station typically includes a semi private sleeping area, bathrooms, a dayroom, a dining area, kitchen facilities, and a gym or other area for exercise. Three drive-through apparatus bays are provided to facilitate the movement of vehicles. Heavy Urban Fire Stations generally have one or more Type 1 Engines (a three-person engine company), squads (e.g., Series F-450, F-500 trucks), and in some instances a ladder truck, and/or an ambulance unit assigned. The County Fire Department does have a standard architectural design for their stations; however, the exterior would be designed consistent with the March Business Center Design Guidelines such that it would fit within the aesthetic characteristics of the area."

As detailed in the 2010 SEIR, the Meridian Fire Station would operate 24-hours per day, seven days per week. Firefighters would work 72- to 96-hour shifts. Training and equipment maintenance would account for most of the firefighters' time when they are not on a call. Training and equipment maintenance would occur both inside and

outside the Meridian Fire Station. As with all Riverside County fire stations, the Fire Department would employ its good neighbor policy with respect to activities conducted outside the station, and the public would be able to visit during normal business hours, generally between 8:00 AM and 5:00 PM, Monday through Friday. The SEIR assumed an average of 6 to 10 daily visitors. The SEIR stated, "Operation of the proposed station would meet the fire service criteria defined in the 2003 Focused EIR and with the addition of new development associated with the proposed [North Campus development]."

The 2010 SEIR evaluated 4,205,000 square feet of North Campus development, including the 10,000-square foot Meridian Fire Station, and concluded impacts were either less than significant or less than significant with mitigation incorporated, with the exception of significant and unavoidable traffic, air quality, and GHG impacts. Based on projected trips, the Meridian Fire Station would contribute only a de minimus amount[1] to these identified impacts. The March Joint Powers Commission certified the 2010 SEIR and adopted a statement of overriding considerations and a mitigation monitoring and reporting program (MMRP). The construction and operation of the Meridian Fire Station would be subject to the mitigation measures set forth in the MMRP for the 2010 SEIR, including the establishment of a funding plan, included as Appendix T to this Final EIR. Therefore, the Meridian Fire Station has already been fully evaluated under CEQA.

Indeed, as stated in the April 29, 2023, letter from the CAL FIRE – Riverside Unit, Riverside County Fire Department to the March JPA, "the West Campus Upper Plateau Project Development Agreement will include the construction of the *previously planned and analyzed* North Campus fire station. County Fire will use this facility to provide emergency services to our community, and the provision of this facility will address any project impacts and provide the needed level of service for fire protection. This proposed facility will also serve other existing or future development with the March JPA service area, addressing cumulative needs." (Emphasis added.)

The construction of the Meridian Fire Station as a Community Benefit of the proposed Development Agreement was included in Recirculated Chapter 3, Project Description, and fully analyzed in the 2010 SEIR.

[1] The 2010 SEIR describes the fire station as a 10,000 square foot urban station out of 4,205,000 square feet of development (0.24%). According to the 2010 SEIR Traffic Report, Table 5-2, the fire station contributed 46 of the analyzed 19,678 project trips (0.23%).

9.1.7 Topical Response 7 – Cumulative Projects

In response to various comments received on the Draft EIR, this topical response addresses commonly raised issues regarding the selection of cumulative projects and the cumulative analysis in the Draft EIR, so as not to be repeated in each individual response, but rather cross-referenced in individual letter responses where applicable.

In addition to the evaluation of project-specific impacts, Section 15130 of the CEQA Guidelines requires an evaluation of cumulative impacts. CEQA defines cumulative as "two or more individual effects that, when considered together, are considerable or can compound to increase other environmental impacts." When a significant cumulative impact is identified, Section 15130 of the CEQA Guidelines requires an EIR to evaluate whether the project's incremental effect is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. These impacts can result from a combination of a proposed project together with other projects, thereby causing related impacts. The cumulative impact of several projects is the change in the environment that results from the incremental impact of one project when added to other closely related past, present, and reasonably foreseeable probable future projects.

As set forth in the CEQA Guidelines, the analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to "be guided by the standards of practicality and reasonableness" (CEQA Guidelines Section 15130(b)).

Scope of Cumulative Analysis

Section 15130(b)(1) of the CEQA Guidelines states that the information utilized in an analysis of cumulative impacts should come from one of two sources, either:

1. A list of past, present, and probable future projects producing related cumulative impacts, including if necessary, those projects outside the control of the agency, or
2. A summary of projections contained in an adopted local, regional, or Statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

Because of the nature of individual environmental factors, the cumulative area for each topical issue is not the same. For instance, topic-specific cumulative study areas have been developed (e.g., South Coast Air Basin for air quality construction/mobile sources). For example, as set forth in Table 4-1 in the Final EIR and provided below, the geographic area for cumulative impacts analysis for air quality (toxic air contaminants and odors) is the immediate vicinity, while the geographic area for cumulative impacts analysis for air quality (construction/mobile sources) and greenhouse gas emissions is the South Coast Air Basin. Please see Recirculated Section 4.2, Air Quality, for additional information on the cumulative air quality analysis.

Cumulative Projects List

Where appropriate to the impact analysis in question, cumulative impacts are assessed with reference to a list of cumulative projects. Table 4-2 in Chapter 4.0, Environmental Analysis, of the Draft EIR provided the cumulative project list, which, as the Draft EIR explained, was developed for purposes of the EIR analysis through consultation with planning and engineering staff from March JPA, County of Riverside, and cities of Riverside and Moreno Valley to include key projects in the March JPA Planning Area and in the City of Riverside, County of Riverside, and City of Moreno Valley.

As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), to develop the cumulative projects list, Urban Crossroads, Inc. prepared a Project traffic analysis scoping package for review by March JPA staff prior to the preparation of the Project Traffic Analysis (Appendix N-2). The December 22, 2021, scoping agreement provided an outline of the Project study area, trip generation, trip distribution, analysis methodology, and cumulative project list and map. The agreement is included in Appendix 1.1 of Project Traffic Analysis (Appendix N-2). The scoping agreement was also shared with the County of Riverside, City of Riverside, and City of Moreno Valley for review and comment, and those comments were taken into consideration as part of the Project Traffic Analysis (Appendix N-2). The scoping agreement expressly requested the agencies provide the latest cumulative projects.

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

Table 4-2 of the Draft EIR included cumulative development projects within 5 miles of the Project site that were known at the time of the Project Notice of Preparation, dated November 18, 2021. Although raised by comments, both the Stoneridge and World Logistics Center projects are over 8 miles from the Project site. The Table 4-2 cumulative project list was developed in coordination with, and reviewed by, March JPA, City of Riverside, City of Moreno Valley, and County of Riverside.

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

Method of Evaluation for Cumulative Impacts

The Draft EIR included analysis of the Project's potential cumulative environmental effects consistent with the requirements of CEQA. The cumulative effects analysis methodology is explained in Chapter 4.0, Environmental Analysis, of the Draft EIR. The Draft EIR noted that consistent with CEQA, the cumulative impacts discussion is guided by the standards of practicality and reasonableness.

In response to comments that the "Method of Evaluation" column of Table 4-1, Geographic Scope and Method of Evaluation for Cumulative Impacts, of the Draft EIR does not adequately explain how the Draft EIR evaluated cumulative impacts for each impact area, Table 4-1 is revised as follows:

Table 4-1. Geographic Scope ~~and Method of Evaluation~~ for Cumulative Impacts

Environmental Resource	Geographic Area	~~Method of Evaluation~~
Aesthetics	Immediate Vicinity	~~List of Projects~~
Air Quality (Toxic Air Contaminants; Odors)	Immediate Vicinity	~~List of Projects~~
Air Quality (Construction/Mobile Sources)	South Coast Air Basin	~~List of Projects~~
Biological Resources	Immediate Vicinity	~~List of Projects~~
Cultural Resources	Regional and Local	~~List of Projects~~
Energy	State	~~List of Projects~~

Table 4-1. Geographic Scope ~~and Method of Evaluation~~ for Cumulative Impacts

Environmental Resource	Geographic Area	~~Method of Evaluation~~
Geology and Soils	Regional	~~List of Projects~~
Greenhouse Gas Emissions	South Coast Air Basin	~~List of Projects~~
Hazards and Hazardous Materials	Immediate Vicinity	~~List of Projects~~
Hydrology and Water Quality	Sub-Watershed	~~List of Projects~~
	Groundwater Basin	
Land Use and Planning	Regional and Local	~~List of Projects~~
Noise (On-Site ~~Construction~~ Noise)	Immediate Vicinity	~~List of Projects~~
Noise (Off-Site Truck Noise)	Immediate Vicinity	~~List of Projects~~
Population and Housing	Regional	~~List of Projects~~
Public Services	Immediate Vicinity	~~List of Projects~~
Recreation	Immediate Vicinity	~~List of Projects~~
Transportation	Regional	~~List of Projects~~
Tribal Cultural Resources	Regional	~~List of Projects~~
Utilities and Service Systems	Immediate Vicinity	~~List of Projects~~
Wildfire	Immediate Vicinity	~~List of Projects~~

The Cumulative Effects subsection of each Impact area of the Draft EIR described the method of evaluation and is summarized below.

Section 4.1, Aesthetics, explained that "the Project would be consistent with the larger visual context of the surrounding area. Similarly, cumulative projects, shown on Table 4-2 and Figure 4-1 of Chapter 4 of this EIR, would introduce a mixture of industrial, business park, and mixed-use land uses."

Recirculated Section 4.2, Air Quality, explained that "Air pollution by nature is largely a cumulative impact. The cumulative geographic context for air quality impacts is the SCAB" and that "the air quality analysis for this Project assumed that individual projects that do not generate operational or construction emissions that exceed SCAQMD's recommended daily thresholds for project specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse cumulative air quality impact. Conversely, projects exceeding SCAQMD's recommended daily thresholds for project specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment, and, therefore, would be considered to have a significant, adverse cumulative air quality impact."

Section 4.3, Biological Resources, explained that "The geographic extent for this cumulative impact analysis includes the jurisdiction of the March JPA Planning Area and the surrounding area," and "Table 4-~~1~~2 within Chapter 4, Environmental Analysis, of this EIR includes a list of cumulative development proposals within the vicinity of the Project site. Proposed projects near the Project site include projects in unincorporated Riverside County and the City of Riverside and City of Moreno Valley within Riverside County."

Section 4.4, Cultural Resources, explained that "Cumulative impacts on cultural resources consider whether impacts of the proposed Project together with other related projects identified within the vicinity of the Project site, when taken as a whole, substantially diminish the number of historic or archeological resources within the same or similar context or property type. Fifty-one cumulative projects have been identified under Table 4-2, Related Projects, of Chapter 4, Environmental Analysis, of this EIR. However, impacts to cultural resources, if any exist, tend to be site-specific."

Section 4.5, Energy, explained that "Cumulative projects that could exacerbate the proposed Project's impacts include any projects that could result in wasteful, inefficient, or unnecessary use of energy (see Table 4-2 in Chapter 4, Environmental Analysis)."

Section 4.6, Geology and Soils, the Draft EIR explained that "Potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards, including unstable geologic conditions. The majority of impacts from geologic hazards, such as liquefaction, landslides, and unstable soils, are site-specific and are therefore generally mitigated on a project-by-project basis."

Section 4.7, Greenhouse Gas Emissions, explained that "GHG emissions inherently contribute to cumulative impacts, and, thus, any additional GHG emissions would result in a cumulative impact" but consistency with statewide, regional, and local plans adopted for the purpose of reducing GHG emissions demonstrates a project's effects on climate change would not be cumulatively considerable.

Recirculated Section 4.8, Hazards and Hazardous Materials, explained that "Hazards and hazardous materials impacts are generally localized to specific sites and do not combine with one another in a way to create a greater or more severe hazard."

Section 4.9, Hydrology and Water Quality, explained that:

> For *Water Quality*, "the geographic context for the analysis of cumulative impacts associated with water quality is the encompassing Santa Ana River Watershed. Although one small Project watershed (Number 13) drains toward the San Jacinto River, this area is not considered a part of the geographic context pertaining to cumulative water quality impacts, as watershed Number 13 is part of the proposed Conservation Easement, which would not be disturbed and therefore would not contribute to cumulative water quality impacts in the San Jacinto River watershed."
>
> For *Groundwater Supply and Groundwater Recharge*, the "Development of nearby related projects, as listed in Table 4-2, would increase land use intensities in the area, resulting in increased water usage."
>
> For *Stormwater Drainage*, the "The geographic context for the analysis of cumulative impacts related to storm drainage is the Santa Ana River Watershed. As discussed for water quality, although one small Project watershed (Number 13) drains toward the San Jacinto River, this area is not considered a part of the geographic context pertaining to cumulative stormwater runoff impacts, as watershed Number 13 is part of the proposed Conservation Easement, which would not be disturbed and therefore would not contribute to cumulative stormwater runoff volume/rate impacts."

Recirculated Section 4.10, Land Use and Planning, explained that the cumulative analysis is based on the list of cumulative projects ("Table 4-~~1~~2, Related Projects, within Chapter 4, Environmental Analysis, of this EIR includes a list of cumulative development proposals within the vicinity of the Project site").

Section 4.11, Noise, explained that "Construction noise and vibration impacts are highly localized (i.e., construction noise from a given site does not generally affect the community noise level at distances beyond 1,500 feet; construction vibration from a given site does not typically affect background vibration levels at distances greater than 200 feet)." Section 4.11, Noise, further explained that for "Non-transportation noise sources (e.g., Project operation) are typically Project-specific and highly localized (i.e., these do not generally affect the community noise level at distances beyond several hundred feet)." Finally, Section 4.11, Noise, explained that for traffic noise, the cumulative analysis is based on "added to roadway volumes generated by other projects on the assembled cumulative project list."

Section 4.12, Population and Housing, explained that "Cumulative impacts to population and housing would result from a combination of projects that induce population growth," and the analysis considered growth in Riverside County as well as the SCAG region in the analysis.

Section 4.13, Public Services, explained that: "a significant adverse cumulative impact to public services would occur if the service demands of the Project were to combine with those of related projects, triggering a need for new or physically altered public services, the development of which could cause significant environmental impacts. A significant adverse cumulative impact could also occur if the Project were to make a considerable contribution to a previously existing deficit in public services." The related projects are listed in Table 4-2 of the Draft EIR.

Section 4.14, Recreation, explained that the cumulative analysis is based on the "list of cumulative development proposals within the vicinity of the proposed Project" found in Table 4.2.

Section 4.15, Transportation, explained that for Vehicle Miles Traveled (the method that by law, is now required to be used to evaluate transportation impacts under CEQA) "a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa." Section 4.15, Transportation, further explains that "when using an absolute VMT metric, i.e., total VMT (as recommended for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact."

Section 4.16, Tribal Cultural Resources, explained that the cumulative analysis is based on "related projects identified within the vicinity of the Project site." These are found in Table 4.2 in the EIR.

Section 4.17, Utilities and Service Systems, explained that:

> For *Potable Water*, "Cumulative water demand is based on near-term (30 years) projected land use within the WMWD Riverside Retail Service Area." The EIR also notes that "The proposed Project and related projects (as shown in Table 4-~~1~~2 of this EIR) would be served by WMWD."
>
> For *Wastewater*, the cumulative analysis is based on the proposed Project and related development found in Table 4.2 of the Draft EIR that is adding wastewater into the municipal sewage infrastructure that flows to the Western Water Recycling Facility.
>
> For *Solid Waste*, the cumulative analysis is based on the proposed Project and related development found in Table 4.2 of the Draft EIR that is generating solid waste in the service area for El Sobrante, Lamb Canyon, and Badlands Landfills.
>
> For *Electric Power, Natural Gas, and Telecommunication*, the cumulative analysis is based on the list of projects in Table 4.2.

Section 4.18, Wildfire, explained that the cumulative analysis is based on "construction and operation of the related projects as shown in Table 4-2."

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9.1.8 Topical Response 8 – Alternatives

In response to various comments received on the Draft EIR, this topical response addresses commonly proposed alternatives and introduces and analyzes Alternative 5 – Non-Industrial Alternative, so as not to be repeated in each individual response, but rather cross-referenced in individual letter responses where applicable.

Selection of Alternatives under CEQA

Pursuant to CEQA, an EIR is required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project" CEQA Guidelines Section 15126.6(a).

The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact "feasible." The final decision regarding the feasibility of alternatives lies with the decision maker for a given project, who must make the necessary findings addressing the potential feasibility of an alternative, including whether it meets most of the basic project objectives or reduces the severity of significant environmental effects pursuant to CEQA. Public Resources Code Section 21081; *see also* CEQA Guidelines Section 15091.

Project Objectives

In developing the alternatives evaluated in the EIR, consideration was given to the ability to meet the basic objectives of the proposed Project and eliminate or substantially reduce the identified significant environmental impacts. The primary objectives of the Project include the following:

- Provide increased job opportunities for residents through the provision of employment-generating businesses.
- Provide open space amenities to serve the region.
- Provide an active park consistent with the 2009 Safety Study prepared by March JPA.
- Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.
- Remove and redevelop a majority of the former munitions storage area of the March AFB.
- Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient, and comfortable.
- Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in *Center for Biological Diversity v. Jim Bartel, et al*. to preserve open space through establishing a Conservation Easement.

Alternatives Eliminated from Consideration

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. The lead agency has the discretion to reject a suggested alternative – even if it has less of an impact. *Ocean Street Extension Neighborhood Association v. City of Santa Cruz* (2021) 73 Cal.App.5th 985,

1016 (decisionmakers may "reject or approve any of the alternatives" and "may reject alternatives that are undesirable from a policy standpoint." (internal citations omitted)). The following discussion presents information on alternatives to the Project raised through the comments on the Draft EIR that were considered but rejected.

Alternate Site

A number of comments requested the Project be developed in a different location. As discussed in Chapter 6, Alternatives, of the Draft EIR and in accordance with CEQA Guidelines Section 15126.6(f)(2), March JPA attempted to identify a feasible alternative off-site location within the Project area that could be available for the development of the Project. Pursuant to CEQA Guidelines Section 15126.6(f)(2)(A), the key question and first step in analysis of the off-site location is whether any of the significant effects of the Project would be avoided or substantially lessened by moving the Project to another location.

After a review of available contiguous open spaces of approximately 369.60 acres (similar to the Specific Plan Area) within the Project vicinity, no large-scale additional sites that could accommodate the proposed Project exist. Further, the CBD Settlement Agreement specifically identifies the Conservation Easement for placement under the conservation easement (Appendix S).

Additionally, neither March JPA nor the Project applicant have ownership of 369.60 acres elsewhere within the Project vicinity such that the Specific Plan Area could be developed on an alternate site. Therefore, off-site locations capable of accommodating the entire Project are considered infeasible, and no off-site location alternatives were carried forward in the EIR's analysis.

All Residential Alternative

A number of comments requested consideration of an alternative that provided housing. As detailed in Chapter 6, Alternatives, of the Draft EIR, the Project site is within the boundaries of the March ARB/Inland Port Airport Land Use Compatibility Plan (ALUCP) and the March JPA General Plan areas. An all-residential project would not meet the basic Project objectives to provide increased job opportunities for residents through the provision of employment-generating businesses or to implement the terms and conditions of the CBD Settlement Agreement (Appendix S). Further, the CBD Settlement Agreement specifically identifies the Conservation Easement for placement under the conservation easement.

The March JPA General Plan currently designates the Project site as Business Park (BP) and Park/Recreation/Open Space (P/R/OS). The Project site has not previously been given a zoning designation by March JPA. The General Plan does not include land zoned for new residential uses because the purpose of the jurisdiction is to increase employment opportunities within the region through the construction of employment-based land uses. Describing its Housing Element, the March JPA General Plan states the "land use plan identifies no new housing areas, and creates an employment center within the housing rich environment of western Riverside County." Additionally, the March JPA General Plan Housing Profile report states: "No housing opportunities are identified within the March JPA Planning Area due to land use compatibility issues related to the continued military activities of the Air Force Reserves and aviation operations."

Furthermore, as shown in Figure 4.10-2, ALUC Compatibility Map, in Recirculated Section 4.10, Land Use and Planning, the Project site is located in the C1 Primary Approach/Departure Zone and C2 Compatibility Zones, which requires approval from the Riverside County Airport Land Use Commission due to the Project site's proximity to the March ARB/Inland Port Airport. The C1 Zone is subject to high to moderate noise and moderate accident potential risk. Both C1 and C2 Compatibility Zones include safety requirements and restrictions within the policies of the ALUCP. The ALUCP requires new residential development in these zones to have sound attenuation features incorporated into the structures sufficient to reduce interior noise levels from exterior aviation-related sources to

no more than CNEL 40 dB. This requirement is intended to reduce the disruptiveness of loud individual aircraft noise events upon uses in this zone and represents a higher standard than the CNEL 45 dB standard set by state and local regulations and countywide ALUC policy.

Given the failure to meet basic Project objectives, and conflict with the March JPA General Plan's focus on job creation, this alternative was considered but rejected.

Alternative Plan #1: The Campus Approach

Some commenters requested consideration of an alternative under which "University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's Opportunity to Advance Sustainability Innovation and Social Inclusion (OASIS), California Air Resources Board (CARB), Center for Environmental Research and Technology (CERT), and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 Settlement Agreements, and significant open space with a conservation easement."

As identified within Table 3-2, Land Uses by Land Use Designation, of Recirculated Chapter 3, Project Description, Research and Development uses are permitted within Business Park, Industrial, and Mixed Use areas on the Project site. The Project does not have identified end-users and nothing under the proposed Project would preclude the development of research centers, if there were an interest and need for these facilities within the Project area. However, the use of the land as an educational/higher learning facility is identified as a prohibited use within the Riverside County Airport Land Use Plan for March Air Reserve Base/March Inland Port within the C1 Primary Approach/Departure Zone, because the likelihood of an aviation incident is "moderate", and the development of an educational facility with public assembly (classrooms) could create the potential for a catastrophic event. The potential for an aviation incident in the less intense Flight Departure Zone (C2), is considered "moderate to low", such that there is no specific prohibition on public assembly. However, a general concern is provided for Children's Schools, which are discouraged and further identified that such uses should not be permitted unless no feasible alternative is available. Though the risk is somewhat reduced to "moderate to low" within the C2 compatibility zone, the conservative approach is not to locate a major educational/public assembly facility within the C2 compatibility zone, due to the moderate to low potential for an aviation incident.

The identified park and open space conservation easement within Alternative Plan #1 are provided under the proposed Project. Additionally, similar to Alternative Plan #1, the Project proposes to preserve two of the Weapons Storage Area bunkers within open space, which will be accessible to the public. A plaque describing the WSA will also be erected adjacent to the retained bunkers. Since Alternative Plan #1 could be developed under the proposed Project Specific Plan, this alternative was not evaluated further.

Alternative Plan #2: The Veterans Village Approach

Some commenters requested consideration of a veterans' village alternative that "incorporates open space and a developed park memorializing the local history of the US Air Force, with low-density affordable veteran housing, medical offices and services, a rehabilitation and therapy center, job training and career transition services, and a small business park." Commenters provided Great Park in Irvine as an example. Great Park encompasses 4,806 acres, which is larger than the entire March JPA Planning Area, almost 13 times larger than the Specific Plan Area and 6 times larger than the Project site. With such a larger scope, the amenities provided by the Great Park development greatly benefit from economies of scale.

As discussed above, under All Residential Alternative, the Project site is located within the March ARB/March Inland Port Land Use Compatibility Plan (ALUCP) and is in the C1 Primary Approach/Departure Zone and C2 Compatibility Zones, which requires approval from the Airport Land Use Commission due to the Project site's proximity to the

March ARB/Inland Port Airport. The C1 Zone is subject to high to moderate noise and moderate accident potential risk. Both C1 and C2 Compatibility Zones include safety requirements and restrictions within the policies of the ALUCP. The General Plan does not include land zoned for new residential uses because the purpose of the jurisdiction is to increase employment opportunities within the region through the construction of employment-based land uses. Describing its Housing Element, the March JPA General Plan states the "land use plan identifies no new housing areas, and creates an employment center within the housing rich environment of western Riverside County." Additionally, the March JPA General Plan Housing Profile report states: "No housing opportunities are identified within the March JPA Planning Area due to land use compatibility issues related to the continued military activities of the Air Force Reserves and aviation operations."

With the exception of housing, the uses proposed under Alternative Plan #2 would be generally permitted under the Project Specific Plan as specified in Table 3-2, Land Uses by Land Use Designation, in Recirculated Chapter 3, Project Description. Medical clinics and social service institutions are allowed in the business park, industrial and mixed use zoning districts; business and professional offices are allowed in the business park and mixed use zoning districts and conditionally allowed in the industrial zoning district; outpatient medical clinics are permitted in the mixed use zoning district. Additionally, similar to Alternative Plan #2, the Project proposes to preserve two of the Weapons Storage Area bunkers within open space, which will be accessible to the public. A plaque describing the WSA will also be erected adjacent to the retained bunkers. Since, with the exception of housing, Alternative Plan #2 could be developed under the proposed Project Specific Plan, this alternative was not evaluated further.

Alternative Plan #3: The State or County Park Approach

A number of commenters requested consideration of a "minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former miliary bases, closed under the Base Realignment and Closure Act (BRAC), to public parks and recreation areas." While developing the entire site as a State or County park would achieve Project Objectives related to open space and recreational uses at the Project site, Alternative Plan #3 would not be consistent with the intent of the March JPA General Plan, which in part identifies:

> "commercial, business park and industrial development are needed to recapture the economic loss attributed to base realignment. The development and reuse within the March JPA Planning Area will further the economic recovery of the region, and will advance toward an equitable balance between jobs provided within the Western Riverside County subregion and the availability of housing. Land set aside at appropriate locations provide for commercial, industrial development, and job creating commerce. Development of business park and industrial land within the Planning Area should focus on commerce and industrial uses which provide employment opportunities, and capture upon the unique opportunities available at March."

Because Alternative Plan #3 would generate minimal new employment opportunities, this Alternative was not evaluated further.

Alternative #5 – Non-Industrial Alternative

Numerous comments requested consideration of an alternative that does not include any industrial warehouse uses. In response to these comments, Alternative 5 – Non-Industrial Alternative has now been included in the analysis. The full description and analysis of Alternative 5 is provided below and is added to Chapter 6, Alternatives, of the Final EIR.

6.4.6 Alternative 5 – Non-Industrial Alternative

Under Alternative 5, the Non-Industrial Alternative, the parcels adjacent to Barton Street would be designated Commercial Retail. Unlike the Project, these parcels would have access to Barton Street to provide neighborhood commercial services. With the exception of the Public Facility and Park/Recreation/Open Space parcels, the remaining acreage within the Specific Plan Area would be designated Office Park. The Project's three Industrial parcels would be divided into 15 Office Park parcels under Alternative 5. Development under Alternative 5 would involve smaller, but more numerous buildings compared to the Project. The maximum height of Alternative 5's buildings would be 45 feet compared with the Project's 50 feet. Under Alternative 5, warehousing and other industrial activities would not be permitted under either the Commercial Retail or Office Park designations. Table 6-13 details the development square footages by land use for the Project and Alternative 5. Compared to the Project, Alternative 5 represents an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would generate approximately 7,821 jobs.[1] Alternative 5 would also include the 17 acres of open space surrounding the Specific Plan Area, the 18.08-acre public park, 42.2-acre active park, and the 445-acre Conservation Easement. See Figure 6..2 for the Alternative 5 Site Plan.

Table 6-13 Comparison of Analyzed Development – Project vs. Alternative 5

Use	Proposed Project (square feet)	Alternative 5 (square feet)[a]	Difference
Warehouse	4,296,779	0	-4,296,779
Office	528,951	4,243,244	+3,714,293
Retail	160,921	374,398	+213,477
Total	**4,986,651**	**4,617,642**	**-369,009**

a – Alternative 5's square footages are based on a 0.25 FAR for Commercial Retail and a 0.45 FAR for Office Park

The following comparative analysis for Alternative 5 is provided for each environmental topic analyzed in the EIR.

6.4.6.1 Environmental Analysis

Aesthetics

As discussed in Section 4.1, Aesthetics, implementation of the proposed Project would not have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surroundings with implementation of **MM-AES-1** (Construction Equipment Staging and Screening). Impacts would be less than significant, and no mitigation is required. With the implementation of **MM-AES-2** (Exterior Lighting Point-by-point Photometric Study Approval) and **MM-AES-3** (Solar Photovoltaic System Approval), the Project's impacts as a new source of substantial light or glare would be reduced to less than significant with mitigation incorporated.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Alternative 5's smaller and shorter buildings would reduce visual impacts vertically and potentially allow for views through the development. Therefore, Alternative 5's potential impacts to scenic vistas,

[1] Employee estimates for Alternative 5 are based on the Riverside County General Plan Table E-3 - Commercial Employment Factors. The March JPA Employment Data discussed in Topical Response 5 - Jobs, did not contain sufficient data to determine March JPA employment ratio for the land uses proposed under Alternative 5.

existing visual character and quality of public views would be reduced compared to the proposed Project. Alternative 5 would have a less than significant impact on a scenic vista, the existing visual character, and the quality of public views of the site and its surroundings with implementation of **MM-AES-1**. With a greater number of buildings requiring lighting for doorways, parking lots, etc., Alternative 5 would likely introduce more new sources of substantial light or glare than the Project and would still require implementation of **MM-AES-2** and **MM-AES-3** to reduce Alternative 5's light and glare impacts to less than significant. In summary, notwithstanding Alternative 5's introduction of more new sources of light and glare, Alternative 5 would result in ***reduced aesthetic impacts*** compared to the proposed Project.

Air Quality

As discussed in Recirculated Section 4.2, Air Quality, implementation of the proposed Project would result in potentially significant air quality impacts. With implementation of **MM-AQ-1** through **MM-AQ-4**, the Specific Plan Area's construction air quality impacts would be reduced to less than significant levels. The Specific Plan Area's daily regional emissions from operations would exceed the SCAQMD thresholds of significance for emissions of VOCs, NOX, CO, PM_{10}, and $PM_{2.5}$ and would, therefore, per SCAQMD criteria, be cumulatively potentially significant and mitigation is required. **MM-AQ-5** through **MM-AQ-27** are designed to reduce Specific Plan Area operational-source VOCs, NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions. However, even with application of **MM-AQ-5** through **MM-AQ-27**, Specific Plan Area operational-source emissions impacts would be significant and unavoidable. Since Specific Plan Area operations would exceed the SCAQMD thresholds of significance, the Project would also conflict with the AQMP, which also results in a significant and unavoidable impact under Threshold AQ-1. The construction and operation of the Specific Plan Area would not exceed applicable LST, CO hotspot, or HRA thresholds and impacts would be less than significant. The Specific Plan Area's odor and other emissions impacts would be less than significant.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development.

Construction Emissions: Given that Alternative 5 represents an approximately 7.4% decrease in total developed square footage compared to the proposed Project, construction impacts under Alternative 5 would likely be reduced. As with the proposed Project, with implementation of **MM-AQ-1** through **MM-AQ-4**, Alternative 5's construction air quality impacts would be reduced to less than significant levels.

Operational Emissions: Based on the mobile source, area source, and energy source emissions associated with Alternative 5 uses, as shown in Table 6-14 below, Alternative 5 would exceed SCAQMD's regional thresholds for VOCs, NOx, CO, PM_{10}, and $PM_{2.5}$. As with the proposed Project, Alternative 5 would be subject to **MM-AQ-5, MM-AQ-6, MM-AQ-7, MM-AQ-10, MM-AQ-13, MM-AQ-14, MM-AQ-21, MM-AQ-26,** and **MM-AQ-27**, which are designed to reduce operational-source emissions. However, there is no way to meaningfully quantify these reductions in CalEEMod, and therefore no numeric emissions credit has been taken in the analysis. As such, even with application of mitigation, Alternative 5 operational-source emissions impacts would be significant and unavoidable.

Table 6-14. Alternative 5 Regional Operational Emissions – with Mitigation

Source	Emissions (lbs/day)					
	VOC	*NO_x*	*CO*	*SO_x*	*PM_{10}*	*$PM_{2.5}$*
Summer						
Mobile Source	304.02	361.95	3,596.77	10.07	927	240

Table 6-14. Alternative 5 Regional Operational Emissions – with Mitigation

Source	Emissions (lbs/day)					
	VOC	*NO_x*	*CO*	*SO_x*	*PM_{10}*	*$PM_{2.5}$*
Area Source	137.68	1.69	200.84	0.01	0.27	0.36
Energy Source	1.76	32.04	26.91	0.19	2.43	2.43
Total Maximum Daily Emissions	**443.46**	**395.68**	**3,824.53**	**10.27**	**929.7**	**242.79**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Winter						
Mobile Source	287.37	388.32	2,946.19	9.45	927	240
Area Source	104.69	0.00	0.00	0.00	0.00	0.00
Energy Source	1.76	32.04	26.91	0.19	2.43	2.43
Total Maximum Daily Emissions	**393.82**	**420.36**	**2,973.10**	**9.64**	**929.43**	**242.43**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

Source: Final EIR Appendix R-3.

As shown in Table 6-15, Alternative 5 is anticipated to generate more emissions per day for all criteria air pollutants (VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$) as compared to emissions generated by the proposed Project.

Table 6-15. Alternative 5 Operational Emissions Comparison

Source	Emissions (lbs/day)					
	VOC	*NO_x*	*CO*	*SO_x*	*PM_{10}*	*$PM_{2.5}$*
Summer						
Alternative 5	443.46	395.68	3,824.53	10.27	929.70	242.79
Proposed Project	349.51	351.05	2,218.17	7.01	578.51	152.42
Emissions Comparison (Alternative 5 - Project)	**+93.95**	**+44.63**	**+1,606.35**	**+3.26**	**+351.19**	**+90.37**
Winter						
Alternative 5	393.82	420.36	2,973.10	9.64	929.43	242.43
Proposed Project	341.51	371.05	1,832.17	6.63	578.51	152.42
Emissions Comparison (Alternative 5 - Project)	**+52.31**	**+49.31**	**+1,140.93**	**+3.01**	**+350.92**	**+90.01**

Source: Final EIR Appendix R-3.

As such, and as is the case with the proposed Project, even with application of **MM-AQ-5, MM-AQ-6, MM-AQ-7, MM-AQ-10, MM-AQ-13, MM-AQ-14, MM-AQ-21, MM-AQ-26 andMM-AQ-27**, Alternative 5 operational-source emissions impacts would be significant and unavoidable. Since Alternative 5 operations would exceed the SCAQMD thresholds of significance, Alternative 5 would also conflict with the AQMP, an additional ***significant and unavoidable*** impact.

Operational Health Risk Assessment: Alternative 5 assumes the development of 374,398 square feet of commercial retail use and 4,243,244 square feet of Office Park use. Warehouse uses would not be permitted under Alternative 5. Based on the West Campus Upper Plateau Alternative 5 Trip Generation Assessment (Appendix R-5), Alternative 5 would be expected to generate 65,482 two-way passenger vehicle trips and 34 two-way truck trips per day (in actual vehicles). As noted in Recirculated Section 4.2, Air Quality, the Project would generate diesel

particulate matter (DPM) emissions during operations by trucks traveling to and from the Project site. During the operations, Alternative 5 would result in significantly fewer truck trips, an approximately 98% reduction, compared to the proposed Project. As such, Alternative 5 would result in ***lower DPM emissions*** and therefore lower cancer and non-cancer health risks for nearby residents, workers, and school children. As such, like the Project, Alternative 5 would not cause a significant health or cancer risk to nearby residents, workers, or school children. Similar to the proposed Project, Alternative 5's odor and other emissions impacts would be ***less than significant***.

In summary, Alternative 5 would result in ***more criteria air quality pollutant emissions yet fewer DPM emissions*** when compared to the Project. Air quality impacts would still be considered ***significant and unavoidable*** under Alternative 5.

Biological Resources

As discussed in Section 4.3, Biological Resources, implementation of the proposed Project would result in potentially significant biological impacts. The Specific Plan Area's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-skinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** (Best Management Practices), **MM-BIO-2** (Least Bell's Vireo), **MM-BIO-3** (Operation-Related Indirect Impacts to Special-Status Wildlife), **MM-BIO-4** (Stephens' Kangaroo Rat Avoidance), **MM-BIO-5A** (Burrowing Owl Avoidance and Mitigation Measures)/**MM-BIO-5B** (Burrowing Owl Relocation and Mitigation Plan), **MM-BIO-6** (San Diego Black-Tailed Jackrabbit), and **MM-BIO-7** (Nesting Bird Avoidance and Minimization Measures). The Specific Plan Area's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** (Upland Vegetation Communities) and **MM-BIO-9** (Aquatic Resources Mitigation). The Specific Plan Area's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**. The Specific Plan would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. The Specific Plan's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-9**. The Specific Plan's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of **MM-BIO-4, MM-BIO-5A/MM-BIO-5B, MM-BIO-6,** and **MM-BIO-9**. As such, with implementation of **MM-BIO-1** through **MM-BIO-9**, the Project's impacts to biological resources would be reduced to less than significant levels.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Since Alternative 5 would have the same development footprint as the proposed Project, impacts to biological resources under Alternative 5 would be similar compared to the proposed Project, and would be potentially significant. Similar to the Project, Alternative 5's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-7**. Alternative 5's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** and **MM-BIO-9**. Alternative 5's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**. Alternative 5 would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. Alternative 5's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the

implementation of **MM-BIO-1** through **MM-BIO-9**. Alternative 5's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of **MM-BIO-4, MM-BIO-5A/MM-BIO-5B, MM-BIO-6,** and **MM-BIO-9**. In summary, notwithstanding Alternative 5's reduced industrial development, Alternative 5 would have ***similar biological resources impacts*** compared to the proposed Project.

Cultural Resources

As discussed in Section 4.4, Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to cultural resources. However, even with the incorporation of **MM-CUL-1** through **MM-CUL-11** and **MM-CUL-13**, the Project's impacts associated with historical and archaeological resources would be significant and unavoidable. With implementation of **MM-CUL-12**, impacts to human remains would be less than significant.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Since Alternative 5 has the same development footprint as the proposed Project, impacts to cultural resources under Alternative 5 would be similar compared to the proposed Project, and would be potentially significant. Even with the incorporation of **MM-CUL-1** through **MM-CUL-11** and **MM-CUL-13**, Alternative 5's impacts to historical and archaeological resources would be *significant and unavoidable*. With implementation of **MM-CUL-12**, Alternative 5's impacts to human remains would be *less than significant*. In summary, notwithstanding Alternative 5's reduced industrial development, Alternative 5 would have ***similar cultural resources impacts*** compared to the proposed Project and would result in ***significant and unavoidable*** impacts to historical and archaeological resources.

Energy

As discussed in Section 4.5, Energy, construction and operation of the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy or conflict with or obstruct a state or local plan for renewable energy or energy efficiency and the Project's energy impacts would be less than significant. Incorporation of **MM-GHG-1** through **MM-GHG-12** and **MM-AQ-1** through **MM-AQ-27** would further reduce the Project's energy use.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Given Alternative 5 represents an approximately 7.4% decrease in total developed square footage, energy impacts during construction would likely be reduced compared to those of the proposed Project. Under operations, the electricity consumption associated with Alternative 5 would be approximately 77,672,577 kilowatt-hours per year compared to the proposed Project's consumption of approximately 45,862,987 kilowatt-hours per year. (Appendix R-3) This approximately 70% increase in electrical consumption, associated with increases related to building lighting, computer use, climate control, etc., is due to the higher electrical demand of Alternative 5's proposed land uses. Alternative 5's fuel consumption would be approximately 13,222,383 gallons per year compared to the proposed Project's consumption of approximately 8,606,089 gallons per year (Appendix R-3). This approximately 54% increase in fuel consumption is due to the higher vehicle trips of Alternative 5's proposed land uses. While Alternative 5 would incorporate **MM-GHG-1** through **MM-GHG-12** and **MM-AQ-1** through **MM-AQ-27**, Alternative 5 would have ***increased energy impacts*** compared to the proposed Project.

Geology and Soils

As discussed in Section 4.6, Geology and Soils, implementation of the proposed Project would result in potentially significant impacts to geology and soils. The Specific Plan Area would have less than significant impacts with regard

to strong seismic ground shaking, seismic-related ground failure, and expansive soils. With the implementation of **MM-GEO-1** (Slope Stability), the Project's impacts related to landslides and unstable soil would be reduced to less than significant. The Specific Plan Area's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of **MM-GEO-2** (Paleontological Resources).

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Since Alternative 5 has the same development footprint as the proposed Project, Alternative 5's impacts to geology and soils would be similar compared to the proposed Project and would be potentially significant. Alternative 5 would have less than significant impacts with regard to strong seismic ground shaking, seismic-related ground failure, and expansive soils. Similar to the Project, with the implementation of **MM-GEO-1**, Alternative 5's impacts related to landslides and unstable soil would be reduced to less than significant. Alternative 5's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of **MM-GEO-2**. In summary, notwithstanding Alternative 5's reduced industrial development, Alternative 5 would have ***similar impacts to geology and soils*** compared to the proposed Project.

Greenhouse Gas Emissions

As discussed in Section 4.7, Greenhouse Gas Emissions, implementation of the proposed Project would result in potentially significant GHG impacts because it could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. However, with implementation of **MM-GHG-1** through **MM-GHG-12**, the Project would be consistent with the applicable plans, including the County CAP, and GHG impacts would be reduced to less than significant levels. Additionally, the Project would not conflict with any of the Senate Bill 32/2017 Scoping Plan elements since any regulations adopted would apply directly or indirectly to the Project. Furthermore, the proposed Project represents 1.24% of the anticipated increase in jobs for the WRCOG region, and therefore, would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or an Air Quality Management Plan, or result in employment growth that would substantially add to traffic congestion.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Alternative 5 would result in GHG emissions equating to 140,661.92 CO_2e, compared to the proposed Project's GHG emissions of 92,591.99 CO_2e. (Appendix R3) This approximately 52% increase is due to the higher GHG emissions from vehicle trips, use of electricity, etc., associated with Alternative 5's proposed land uses. With implementation of **MM-GHG-1** through **MM-GHG-12,** Alternative 5 would likely not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. While both Alternative 5 and the proposed Project would be consistent with applicable plans, including the County CAP, with the implementation of **MM-GHG-1** through **MM-GHG-12,** Alternative 5 would still result in ***increased GHG impacts*** compared to the proposed Project.

Hazards and Hazardous Materials

As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, implementation of the proposed Project would result in potentially significant hazard and hazardous materials impacts. During construction of the Specific Plan Area, implementation of **MM-HAZ-1** would reduce the Project's impacts involving the routine transport, use, or disposal of hazardous materials. During operations, the Project would have a less than significant impact with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Given the proximity of the neighboring preschool at Community Grove Church, **MM-HAZ-2** is required to reduce

potentially significant impacts associated with Project uses emitting and/or handling hazardous materials within one-quarter mile of an existing or planned school. With implementation of **MM-HAZ-3**, the Project's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce the Project's impacts involving wildland fires. With implementation of **MM-HAZ-1, MM-HAZ-2**, **MM-HAZ-3**, and **MM-FIRE-1,** the Project's hazards and hazardous materials impacts would be reduced to less than significant levels.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. During Alternative 5 construction, implementation of **MM-HAZ-1** would reduce Alternative 5's impacts involving the routine transport, use, or disposal of hazardous materials. As with the proposed Project, these impacts would be less than significant. During operations, Alternative 5 would have a less than significant impact with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. The development footprint under Alternative 5 would still introduce new uses within proximity of the preschool, and as such, **MM-HAZ-2** would still be required under Alternative 5, although land uses proposed under Alternative 5 would be less likely to require toxic or highly toxic gases. With implementation of **MM-HAZ-3**, Alternative 5's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce Alternative 5's impacts involving wildland fires to less than significant levels. In summary, given Alternative 5 would result in development on the same footprint of the Project site, Alternative 5 would have ***similar impacts related to hazards and hazardous materials*** to the proposed Project.

Hydrology and Water Quality

As discussed in Section 4.9, Hydrology and Water Quality, implementation of the proposed Project would result in potentially significant impacts to hydrology and water quality. With implementation of **MM-HYD-1** (Interim Soil Stabilization Plan) and **MM-HYD-2** (Water Quality Management Plan), the Project's impacts to surface or groundwater quality would be reduced to less than significant levels. In addition, implementation of the Storm Water Pollution Prevention Plan (SWPPP) in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing drainage pattern of the site or area. The Project's impacts to groundwater supplies and recharge would be less than significant. With implementation of **MM-HYD-3** (Hydrology/Drainage Study), the Project's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further the Project would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows, or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Since Alternative 5 has the same development footprint as the proposed Project, Alternative 5's impacts to hydrology and water quality would be similar compared to the proposed Project and would be potentially significant. Similar to the Project, with implementation of **MM-HYD-1** and **MM-HYD-2**, Alternative 5's impacts to surface or groundwater quality would be reduced to less than significant levels. In addition, implementation of the SWPPP in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing

drainage pattern of the site or area. Alternative 5's impacts to groundwater supplies and recharge would be less than significant. With implementation of **MM-HYD-3,** Alternative 5's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further, Alternative 5 would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows, or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan. In summary, notwithstanding Alternative 5's reduced industrial development, Alternative 5 would have ***similar impacts to hydrology and water quality*** compared to the proposed Project.

Land Use and Planning

As discussed in Recirculated Section 4.10, Land Use and Planning, with implementation of **MM-AQ-1** through **MM-AQ-27, MM-BIO-1** through **MM-BIO-9**, **MM-CUL-1** through **MM-CUL-13**, **MM-GEO-1, MM-GEO-2, MM-GHG-1** through **MM-GHG-12, MM-HAZ-1** through **MM-HAZ-3, MM-HYD-1** through **MM-HYD-3, MM-TRA-1** and **MM-TRA-2**, and **MM-FIRE-1** through **MM-FIRE-3,** the Project would be generally consistent with the March JPA General Plan goals and policies, as well as the Draft Environmental Justice Element. March JPA designates the Project site as Business Park (BP), Industrial (IND), and Park/Recreation/Open Space (P/R/OS) land uses in the March JPA General Plan. The Project site has not previously been given a zoning designation by March JPA; therefore, the Project proposes zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. The Project proposes adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. The Project would be consistent with the March Development Code and the Riverside County ALUCP. Furthermore, the proposed Project would implement the guiding principles, goals, and policies of SCAG's Connect SoCal and the County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. As such, with incorporation of mitigation, the Project would result in less than significant land use impacts through conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. As such, Alternative 5's land use and planning impacts would be similar to the proposed Project. With implementation of **MM-AQ-1** through **MM-AQ-4**, **MM-AQ-5** through **MM-AQ-7, MM-AQ-10, MM-AQ-13, MM-AQ-14, MM-AQ-21, MM-AQ-24, MM-AQ-26, MM-AQ-27, MM-BIO-1** through **MM-BIO-9**, **MM-CUL-1** through **MM-CUL-13**, **MM-GEO-1, MM-GEO-2, MM-GHG-1** through **MM-GHG-12, MM-HAZ-1** through **MM-HAZ-3, MM-HYD-1** through **MM-HYD-3, MM-TRA-1** and **MM-TRA-2**, and **MM-FIRE-1** through **MM-FIRE-3,** Alternative 5 would be generally consistent with the March JPA General Plan Goals and policies as well as the Draft Environmental Justice Element. Similar to the proposed Project, Alternative 5 would propose zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Commercial Retail, Office Park (OP), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. Alternative 5 would also include adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. Alternative 5 would be consistent with the March Development Code and the Riverside County ALUCP. Alternative 5 would be consistent with the guiding principles, goals, and policies of SCAG's Connect SoCal and the County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. In summary, Alternative 5 would result in less than significant land use and planning impacts and have ***similar land use and planning impacts*** to the proposed Project.

Noise

As discussed in Section 4.11, Noise, the Project would not generate substantial temporary or permanent increase in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Therefore, the Project would have a significant and unavoidable noise impact and no feasible mitigation measures are available to reduce Project-related significant traffic noise increases along Segment #13. All other noise and vibration impacts associated with construction and operation of the Project would be less than significant.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. As construction and grading activities would be reduced under Alternative 5, construction noise levels would be reduced compared to those of the proposed Project.

According to the West Campus Upper Plateau Alternative 5 Trip Generation Assessment prepared by Urban Crossroads, Inc. (Appendix R-5), Alternative 5 is anticipated to generate a total of 65,516 daily vehicles trips with 34 truck trips. The proposed Project evaluated in this Final EIR included 33,260 daily vehicle trips with 2,054 truck trips. Therefore, Alternative 5 represents a near doubling of the vehicle trips (+32,222) and a substantial reduction of truck trips (-2,020). The Federal Highway Administration (FHWA) noise prediction model is significantly influenced by the number of heavy trucks in the vehicle mix. Table 6-17, Off-Site Traffic Noise Level Increases, presents a summary of the Project related off-site traffic noise level increases. As shown on therein, the unmitigated off-site traffic noise levels increase evaluated for the proposed Project would range from 0.0 to 4.4 dBA CNEL, while the off-site traffic noise level increases for Alternative 5 would range from 0.0 to 1.8 dBA CNEL. As such, off-site traffic noise level increases would be reduced under Alternative 5 due to the reduction in the number of heavy trucks.

Table 6-17. Off-Site Traffic Noise Level Increases

Road	Segment	Receiving Land Use	Incremental Noise Level Increase Summary (dBA CNEL)[2]							
			Project				*Alternative 5*			
			E	*EA*	*OYC*	*HY*	*E*	*EA*	*OYC*	*HY*
Alessandro Blvd.	s/o Arlington Av.	Sensitive	0.1	0.1	0.1	0.0	0.1	0.1	0.1	0.1
Alessandro Blvd.	s/o Canyon Crest Dr.	Sensitive	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.1
Trautwein Rd.	n/o Van Buren Blvd.	Sensitive	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Barton St.	n/o Van Buren Blvd.	Sensitive	0.1	0.1	0.1	0.0	0.3	0.3	0.2	0.1
Sycamore Canyon Blvd.	n/o Cottonwood Av.	Non-Sensitive	0.6	0.5	0.5	0.4	0.2	0.1	0.1	0.1
Meridian Pkwy.	n/o Van Buren Blvd.	Non-Sensitive	1.6	1.4	1.3	1.1	1.3	1.2	1.0	0.9
Day St.	n/o Alessandro Blvd.	Sensitive	0.1	0.1	0.0	0.0	0.1	0.1	0.1	0.0
Frederick St.	n/o Cactus Av.	Non-Sensitive	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.1
Alessandro Blvd.	w/o Barton St.	Sensitive	0.1	0.1	0.1	0.1	0.3	0.2	0.2	0.2
Alessandro Blvd.	e/o Barton St.	Sensitive	0.1	0.1	0.2	0.1	0.3	0.2	0.3	0.2
Alessandro Blvd.	e/o Meridian Pkwy.	Non-Sensitive	0.2	0.2	0.2	0.2	0.4	0.3	0.3	0.3

Table 6-17. Off-Site Traffic Noise Level Increases

Road	Segment	Receiving Land Use	Incremental Noise Level Increase Summary (dBA CNEL)[2]							
			Project				*Alternative 5*			
			E	*EA*	*OYC*	*HY*	*E*	*EA*	*OYC*	*HY*
Alessandro Blvd.	w/o Day St.	Sensitive	0.0	0.0	0.1	0.1	0.1	0.1	0.1	0.1
Cactus Av.	e/o Meridian Pkwy.	Non-Sensitive	4.4	4.0	4.0	3.4	1.8	1.6	1.6	1.3
Cactus Av.	w/o Elsworth St.	Non-Sensitive	0.2	0.2	0.2	0.2	0.2	0.1	0.2	0.1
Orange Terrace Pkwy.	e/o Trautwein Rd.	Sensitive	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Van Buren Blvd.	w/o Wood Rd.	Sensitive	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.1
Van Buren Blvd.	e/o Wood Rd.	Sensitive	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.1
Van Buren Blvd.	e/o Orange Terrace Pkwy.	Sensitive	0.2	0.2	0.1	0.1	0.4	0.3	0.3	0.2
Van Buren Blvd.	e/o Meridian Pkwy.	Non-Sensitive	0.5	0.4	0.2	0.2	0.1	0.1	0.0	0.1

Source: Appendix R-4.

Table 6-18, Off-Site Traffic Noise Threshold Exceedances, shows that Segment #13 (Cactus Avenue east of Meridian Parkway) would experience potentially significant off-site traffic noise level increases due to the proposed Project. Based on the significance criteria for off-site traffic noise presented in the Noise Study prepared for the proposed Project (Appendix M-1), land uses adjacent to all the study area roadway segments would experience ***reduced as well as less than significant*** noise level increases on receiving land uses due to Alternative 5-related traffic.

Table 6-18. Off-Site Traffic Noise Threshold Exceedances

ID	Road	Segment	Limit	Incremental Noise Level Increase Summary (dBA CNEL)[2]							
				Project				*Alternative 5*			
				E	*EA*	*OYC*	*HY*	*E*	*EA*	*OYC*	*HY*
1	Alessandro Blvd.	s/o Arlington Av.	1.5	No	No	No	No	No	No	No	No
2	Alessandro Blvd.	s/o Canyon Crest Dr.	1.5	No	No	No	No	No	No	No	No
3	Trautwein Rd.	n/o Van Buren Blvd.	1.5	No	No	No	No	No	No	No	No
4	Barton St.	n/o Van Buren Blvd.	1.5	No	No	No	No	No	No	No	No
5	Sycamore Canyon Blvd.	n/o Cottonwood Av.	3.0	No	No	No	No	No	No	No	No
6	Meridian Pkwy.	n/o Van Buren Blvd.	3.0	No	No	No	No	No	No	No	No
7	Day St.	n/o Alessandro Blvd.	1.5	No	No	No	No	No	No	No	No
8	Frederick St.	n/o Cactus Av.	3.0	No	No	No	No	No	No	No	No
9	Alessandro Blvd.	w/o Barton St.	1.5	No	No	No	No	No	No	No	No
10	Alessandro Blvd.	e/o Barton St.	1.5	No	No	No	No	No	No	No	No
11	Alessandro Blvd.	e/o Meridian Pkwy.	3.0	No	No	No	No	No	No	No	No
12	Alessandro Blvd.	w/o Day St.	1.5	No	No	No	No	No	No	No	No

Table 6-18. Off-Site Traffic Noise Threshold Exceedances

ID	Road	Segment	Limit	Incremental Noise Level Increase Summary (dBA CNEL)[2]							
				Project				*Alternative 5*			
				E	*EA*	*OYC*	*HY*	*E*	*EA*	*OYC*	*HY*
13	Cactus Av.	e/o Meridian Pkwy.	3.0	**Yes**	**Yes**	**Yes**	**Yes**	No	No	No	No
14	Cactus Av.	w/o Elsworth St.	3.0	No	No	No	No	No	No	No	No
15	Orange Terrace Pkwy.	e/o Trautwein Rd.	1.5	No	No	No	No	No	No	No	No
16	Van Buren Blvd.	w/o Wood Rd.	1.5	No	No	No	No	No	No	No	No
17	Van Buren Blvd.	e/o Wood Rd.	1.5	No	No	No	No	No	No	No	No
18	Van Buren Blvd.	e/o Orange Terrace Pkwy.	1.5	No	No	No	No	No	No	No	No
19	Van Buren Blvd.	e/o Meridian Pkwy.	3.0	No	No	No	No	No	No	No	No

Source: Appendix R-4.

As discussed in Section 4.11, Noise, of the EIR, the on-site Project-related noise sources are expected to include: loading dock activity, roof-top air conditioning, trash enclosure activity, and parking lot vehicle movements, truck movements, and park activities. Under Table 4.11-24, Hourly Average Noise Level Measurements for Reference Sound Sources, loading dock activities (65.7 dBA L_{eq}) and truck movements (59.8 dBA L_{eq}) represent the noisiest Project-related operational activities. For Alternative 5, on-site related noise sources are expected to include similar types of noise source activities without the heavy truck movements associated with loading docks or truck movements needed to support the proposed Project industrial/warehouse land uses. In addition, due to the commercial retail/Office Park use associated with Alternative 5, other noise sources activities may be included as part of the Alternative 5 land use. This could include noise source activities such as fast-food restaurant drive-through speakerphones and/or gas stations fueling. Table 6-19, Alternative 5 Reference Noise Level Measurements, presents a summary of the reference noise level measurements needed to assess the on-site Alternative 5 land uses. As shown on Table 6-19, none of the on-site Alternative 5 operational noise sources are as loud as loading dock activity and truck movements.

Alternative 5 would involve a slightly reduced amount of development as the Project but would not include noise from loading dock activity or truck movements. It is anticipated Alternative 5's on-site operational noise would be ***reduced*** as compared to the Project.

Table 6-19. Alternative 5 Reference Noise Level Measurements

Noise Source	Noise Source Height (feet)	Minutes within Hour		Reference Noise Level (dBA Leq at 50 feet)	Sound Power Level (dBA)
		Day	*Night*		
Roof-Top Air Conditioning Units	5'	39	28	57.2	88.9
Drive-Thru Activity	**3'**	**60**	**60**	**51.5**	**83.2**
Trash Enclosure Activity	5'	10	10	57.3	89.0
Gas Station Activity	**5'**	**60**	**60**	**48.2**	**79.9**

Table 6-19. Alternative 5 Reference Noise Level Measurements

Noise Source	Noise Source Height (feet)	Minutes within Hour		Reference Noise Level (dBA Leq at 50 feet)	Sound Power Level (dBA)
		Day	*Night*		
Park Activities	5'	60	0	49.4	81.1

Source: Appendix R-4.

In summary, Alternative 5 would have ***fewer noise impacts*** compared to the proposed Project and would reduce an identified significant and unavoidable operational noise impact to a ***less than significant level***.

Population and Housing

As discussed in Section 4.12, Population and Housing, under the buildout scenario, it is anticipated that the Project would create approximately 3,622 full-time jobs. Based on the County's unemployment rate, this EIR assumes that the Project's employees will be primarily existing residents of Riverside County (see Topical Response 5 – Jobs). The anticipated number of jobs generated by the Project would be a nominal addition to the County's existing and projected labor force. Thus, the employment growth that would be attributed to the Project is consistent with SCAG's overall growth projections and would not result in a substantial increase of unplanned population growth. Therefore, the Project would have a less than significant impact related to population and housing and no mitigation is required.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Alternative 5 would generate approximately 7,821 jobs compared to the Project's 3,622 jobs. This 116% increase in jobs would account for a larger percentage of SCAG's 2030 projections (5.67% of 138,000 jobs) and 2045 projections (2.79% of 280,000 jobs) for Riverside County but a nominal percentage (0.95%) of the County's estimated 2019 labor force.[2] The employment growth that would be attributed to Alternative 5 is consistent with SCAG's overall growth projections and would not result in a substantial increase of unplanned population growth. Therefore, Alternative 5 would have ***comparable population and housing impacts*** to the proposed Project.

Public Services

As discussed in Section 4.13, Public Services, with the implementation of **MM-FIRE-1**, the Project's impacts to fire services would be reduced to less than significant. The Project's impacts to police services, schools, parks and other public facilities would be less than significant and no mitigation is required.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Alternative 5 would generate approximately 7,821 jobs and as such, there is the potential for Alternative 5 to result in greater impacts to public services but not to the extent that additional facilities would need to be constructed. Alternative 5 would have ***increased impacts to public services*** compared to the proposed Project due to the increased number of employees at the Project site.

[2] 7,821 ÷ 823000 = 0.0095 x 100 = 0.95%

Recreation

As discussed in Section 4.14, Recreation, it is likely that the majority of the Campus Development's future employees are already residents of the nearby communities and are already using the local parks and recreational facilities. There could be an increase in demand for recreational facilities but because the Project's employees and surrounding neighborhoods would have access to the proposed 60.28-acre Park, any increased demand would not result in the need to construct additional recreational facilities under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. The impacts related to the Park's construction have been included in all of the analyses in this EIR. Additionally, the currently existing service roads within the Conservation Easement, as depicted by the red lines on Figure 3-4, would continue to be utilized by the public for passive recreation as authorized by March JPA, consistent with the terms of the CBD Settlement Agreement (Appendix S). Therefore, the Project would result in less than significant impacts to recreational facilities and no mitigation is required.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. The proposed Public Facility and Park/Recreation/Open Space components of Alternative 5 would be the same as the proposed Project. Alternative 5 would result in the creation of 5,221 more jobs at the Project site than the proposed Project, and as such, there is the potential for Alternative 5 to result in greater impacts to recreation. Alternative 5 has the potential to result in an increased demand on recreational resources compared to the proposed Project. Therefore, Alternative 5 would have ***increased recreational impacts*** compared to the proposed Project.

Transportation

As discussed in Section 4.15, Transportation, with the incorporation of **MM-TRA-1** (Construction Traffic Management Plan), Project construction impacts on the circulation system would be reduced to less than significant. With implementation of **MM-TRA-2** (Traffic Safety Plan for Barton Street), the Project's operational impacts on the circulation system would be less than significant. The Specific Plan Area's impact on VMT would be less than significant. Although the Specific Plan Area is not anticipated to have a significant VMT impact, **MM-AQ-21** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard. The Project's potential to increase hazards due to design features or incompatible uses would be reduced to less than significant with implementation of **MM-TRA-1** and **MM-TRA-2**.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. The trip generation rates used for this analysis are based upon information collected by the ITE as provided in their Trip Generation Manual (11th Edition, 2021) and is included as Appendix R-5.

Table 6-20. Alternative 5 Trip Generation Summary

Land Use	Quantity Units	AM Peak Hour			PM Peak Hour			Weekday Daily	Saturday Peak Hour		
		In	*Out*	*Total*	*In*	*Out*	*Total*		*In*	*Out*	*Total*
Office Park	4,243.244 TSF	4,869	859	5,728	1,346	3,831	5,177	52,786	1,407	1,198	2,605
Shopping Center	374.398 TSF										
Passenger Cars		206	127	333	693	749	1,442	14,722	942	870	1,812
Trucks		4	0	4	0	0	0	34	0	0	0
Internal Trip Reduction		-104	-104	-208	-70	-70	-140	-1,428	-47	-47	-94
Pass-by Reduction		0	0	0	-121	-139	-261	-2798	-172	-163	-335
Active Park	42.20 acres	137	137	274	95	95	190	2,110	187	203	390
Public Park	18.08 acres	6	6	12	4	4	8	90	19	20	39
Total Trips	—	**5,118**	**1,025**	**6,143**	**1,947**	**4,470**	**6,416**	**65,516**	**2,336**	**2,081**	**4,417**

Source: Appendix R-5.

When comparing the trip generation between Alternative 5 and the proposed Project, as shown in Table 6-21, Alternative 5 Trip Generation Comparison, Alternative 5 would result in a net increase in 30,202 trips per day over the proposed Project.

Table 6-21. Alternative 5 Trip Generation Comparison

Project	AM Peak Hour			PM Peak Hour			Weekday Daily	Saturday Peak Hour		
	In	*Out*	*Total*	*In*	*Out*	*Total*		*In*	*Out*	*Total*
Project Traffic Study	1,353	408	1,761	902	2,486	3,389	35,314	844	798	1,642
Alternative 5	5,118	1,025	6,143	1,947	4,470	6,416	65,516	2,336	2,081	4,417
Net Change in Trips	+3,765	+617	+4,382	+1,045	+1,984	+3,028	+30,202	+1,492	+1,283	+2,775

Source: Appendix R-5.

As with the proposed Project, with the incorporation of **MM-TRA-1**, Alternative 5 construction impacts on the circulation system would be reduced to less than significant.

Vehicle Miles Traveled (VMT) for Alternative 5 has been evaluated using the methodology and procedures outlined in the Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment prepared by the Western Riverside Council of Governments. This analysis is included in Appendix R-6. Retail uses are evaluated utilizing the VMT metric of total VMT. A 15-mile service area is a conservatively estimated distance from the Project as the retail component is not anticipated as a regional shopping destination but instead is anticipated to serve the surrounding communities of Riverside, Moreno Valley, Perris, etc. Additionally, large boundaries such as Riverside County or WRCOG tend to be too large of an area to accurately measure an individual project's effect on VMT without model noise (i.e., convergence criteria) influencing the results.

A significant impact associated with VMT would occur if a project's retail component would result in a net increase in total VMT for the region. As shown in Table 6-22, Net Change in Regional Total VMT for Retail, the increase in retail square footage proposed by Alternative 5 would result in an increase in total VMT within the region (i.e., 15-mile boundary) and a potentially significant impact.

Table 6-22. Net Change in Regional Total VMT for Retail

	Project	Alternative 5
Total VMT for No Project/Alt 5 Retail	43,167,218	43,167,218
Total VMT for With Project/Alt 5 Retail	43,039,938	43,862,638
+/- to VMT	-127,280	+695,420
Percent Change	-0.29%	+1.61%
Potentially Significant?	**No**	**Yes**

Source: Appendix R-6.

Non-retail employment based VMT is calculated as homebased work (HBW) VMT divided by the Project's non-retail employment, which results in the efficiency metric HBW VMT per employee or VMT per employee. A significant impact to VMT would occur if the addition of a project's non-retail components would result in project-generated VMT per employee to exceed 15% below the WRCOG's baseline of 29.97 VMT per employee for a regional average significance threshold of 25.47 VMT per employee. Table 6-23, Non-Retail VMT Per Employee, presents HBW VMT as calculated for both the Project's and Alternative 5's non-retail land uses, the number of Project and Alternative 5 non-retail employees and the resulting VMT per employee metric compared to the impact threshold.

Table 6-23. Non-Retail Per Employee

	Project	Alternative 5
Non-Retail Employment	2,340	7,072
HBW VMT	58,874	205,170
VMT Per Employee	24.12	26.24
WRCOG Threshold	25.47	25.47
Potentially Significant?	**No**	**Yes**

Source: Appendix R-6.

Project Alternative 5 would shift all Industrial land use and non-Barton Street Mixed Use to Office Park and convert the Mixed Use areas along Barton Street to Commercial Retail. Warehousing would not be a permitted use under Alternative 5. These shifts in land use result in a corresponding increase in overall vehicle trip generation and an

associated increase in VMT over the proposed Project. As such, Alternative 5 would result in ***greater VMT impacts***, as well as introduce a ***new significant impact*** when compared to the proposed Project.

Tribal Cultural Resources

As discussed in Section 4.16, Tribal Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to tribal cultural resources. However, even with implementation of **MM-CUL-1** through **MM-CUL-13**, the Project's impacts to tribal cultural resources would remain *significant and unavoidable*.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Given Alternative 5's similar development footprint, impacts to tribal cultural resources under Alternative 5 would be similar compared to the proposed Project, and would also be potentially significant. Even with the incorporation of **MM-CUL-1** through **MM-CUL-13**, Alternative 5's impacts to tribal cultural resources would be significant and unavoidable. Therefore, implementation of Alternative 5 would result in ***similar significant and unavoidable tribal cultural resources impacts*** when compared to the proposed Project.

Utilities and Service Systems

As discussed in Section 4.17, Utilities and Service Systems, the Project would have less than significant impacts to facilities providing water, wastewater, storm water, electric power, natural gas, and telecommunications. There are sufficient water supplies available and wastewater treatment capacity to serve the Project, resulting in less than significant impacts. The Project would have a less than significant impact on solid waste infrastructure and capacity and would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the Project impacts to utilities and service systems would be less than significant, and no mitigation is required.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Alternative 5 would result in the creation of approximately 5,221 more jobs at the Project site than the proposed Project, and as such, there is the potential for Alternative 5 to result in greater impacts to utilities and service systems when compared to the proposed Project. As such, Alternative 5 would have ***increased impacts to utilities and service systems*** compared to the proposed Project due to the different mix of land uses and increased number of employees at the Project site.

Wildfire

As discussed in Section 4.18, Wildfire, the Project site is near lands classified as Very High Fire Hazard Severity Zone (FHSZ) and implementation of the proposed Project would result in potentially significant wildfire impacts. However, with implementation of **MM-FIRE-1** through **MM-FIRE-3**, as well as **MM-HYD-3**, the Project's potential to facilitate wildfire spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. Given that Alternative 5 would have the same development footprint, Alternative 5's wildfire impacts would be similar but reduced compared to the proposed Project but would still be potentially significant.

With implementation of **MM-FIRE-1** through **MM-FIRE-3**, as well as **MM-HYD-3**, Alternative 5's potential to facilitate wildfire spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels. Therefore, Alternative 5 would have ***similar wildfire impacts*** compared to the proposed Project.

6.4.6.2 Project Objectives

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of development square footage. Alternative 5 would eliminate all Industrial development. As shown in Table 6-24, Alternative 5 meets each Project objective.

Table 6-24. Summary of Alternative 5 Success at Meeting Project Objectives

Project Objective	Does Alternative 5 Meet Objective?
1. Provide increased job opportunities for residents through the provision of employment-generating businesses.	**Yes**. Alternative 5 would provide increased job opportunities through the provision of employment-generating businesses. Alternative 5 would achieve this objective to a greater extent than the Project because Alternative 5 would employ approximately 5,221 more employees at the site than the proposed Project.
2. Provide open space amenities to serve the region.	**Yes**. Alternative 5 would provide open space amenities to serve the region. Alternative 5 would fully achieve this Project objective.
3. Provide an active park consistent with the 2009 Safety Study prepared by March JPA.	**Yes**. Alternative 5 would provide the same 60.28-acre Park as the proposed Project. Alternative 5 would fully achieve this Project objective.
4. Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.	**Yes**. Alternative 5 would provide all the same roadway infrastructure as the proposed Project. As such, Alternative 5 would fully achieve this Project objective.
5. Remove and redevelop a majority of the former munitions storage area of the March AFB.	**Yes**. Alternative 5 would remove and redevelop a majority of the former munitions storage area. As such, Alternative 5 would fully achieve this Project objective.
6. Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system, which is both safe and comfortable.	**Yes**. Under Alternative 5, the buildout would include the provision of new roadways that could accommodate all modes of travel, including pedestrian and bicycle movement. As such, Alternative 5 would fully achieve this Project objective.

Table 6-24. Summary of Alternative 5 Success at Meeting Project Objectives

Project Objective	Does Alternative 5 Meet Objective?
7. Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in *Center for Biological Diversity v. Jim Bartel, et al.* to preserve open space through establishing a Conservation Easement.	**Yes**. Alternative 5 would place the Conservation Easement under a conservation easement. As such, Alternative 5 would fully achieve this Project objective.

Alternative 5 would result in fewer noise impacts, avoiding a significant and unavoidable operational noise impact; however, Alternative 5 would increase the severity of significant and unavoidable air quality impacts as well as result in new significant and unavoidable VMT impacts. Alternative 2 would remain the Environmentally Superior Alternative. With the addition of Alternative 5, Table 6-1, Comparison of Project and Alternatives Impacts, is updated to read as follows:

Table 6-1. Comparison of Project and Alternatives Impacts

Environmental Topic	Project Impact	Alternative 1 No Project	Alternative 2 Reduced Development	Alternative 3 Restricted Industrial Building Size	Alternative 4 Reduced Cultural Resource Impact	Alternative 5 Non-Industrial Alternative
Aesthetics	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	= LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation
Air Quality	Significant and Unavoidable	▼ No Impact	▼ SUI	▼ SUI	▼ SUI	▲ SUI
Biological Resources	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	= LTS with Mitigation	▼ LTS with Mitigation	= LTS with Mitigation
Cultural Resources	Significant and Unavoidable	▼ No Impact	▼ SUI	= SUI	▼ SUI	= SUI
Energy	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	▲ LTS with Mitigation

Table 6-1. Comparison of Project and Alternatives Impacts

Environmental Topic	Project Impact	Alternative 1 No Project	Alternative 2 Reduced Development	Alternative 3 Restricted Industrial Building Size	Alternative 4 Reduced Cultural Resource Impact	Alternative 5 Non-Industrial Alternative
Geology and Soils	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	= LTS with Mitigation	▼ LTS with Mitigation	= LTS with Mitigation
Greenhouse Gas Emissions	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	▲ LTS with Mitigation
Hazards/ Hazardous Materials	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	= LTS with Mitigation
Hydrology/ Water Quality	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	= LTS with Mitigation	▼ LTS with Mitigation	= LTS with Mitigation
Land Use/ Planning	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	= LTS with Mitigation
Noise	Significant and Unavoidable	▼ No Impact	▼ SUI	▼ SUI	▼ SUI	▼ LTS
Population and Housing	Less than Significant	▼ No Impact	▼ LTS	▼ LTS	▼ LTS	= LTS
Public Services	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	▲ LTS with Mitigation
Recreation	Less than Significant	▼ No Impact	▼ LTS	▼ LTS	▼ LTS	▲ LTS
Transportation	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	▲ SUI
Tribal Cultural Resources	Significant and Unavoidable	▼ No Impact	▼ SUI	= SUI	▼ SUI	= SUI
Utilities/ Service Systems	Less than Significant	▼ No Impact	▼ LTS	▼ LTS	▼ LTS	▲ LTS
Wildfire	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	= LTS with Mitigation

Notes:
Green – No Impact or Less than Significant, Yellow – Less than Significant with Mitigation, Red – Significant and Unavoidable
▲ Impacts would be greater than those of the proposed Project.
= Impacts would be comparable to those of the proposed Project
▼ Impacts would be reduced when compared to those of the proposed Project.

The addition of Alternative 5 to the EIR does not constitute significant new information such that recirculation of the EIR under CEQA Guidelines Section 15088.5 would be required.

9.1.9 Topical Response 9 – Long-Term Project Implementation and Enforcement

In response to various comments received on the Draft EIR, this topical response addresses commonly raised issues regarding the reversion of March JPA's land use authority in 2025 to the County of Riverside and long-term implementation of the proposed Specific Plan and enforcement of Project conditions of approval and mitigation measures, so as not to be repeated in each individual response, but rather cross-referenced in individual letter responses where applicable.

Joint Exercise of Powers Act, Government Code Section 6500, *et seq.*

Joint powers authorities (JPAs) are mechanisms by which two or more public agencies jointly exercise powers that are common to all. The Joint Exercise of Powers Act, Government Code Section 6500, *et seq*. (JPA Act), governs the creation, operation, and dissolution of JPAs. There are essentially two types of JPAs. The first type of JPA is formed where two or more public agencies enter into an agreement to jointly exercise common powers. The second type of JPA is created when two or more public agencies form a separate legal entity.[1] The March JPA is this second type of JPA. Both types of JPAs require a JPA agreement that sets out the purpose and powers of the JPA, along with how that purpose will be accomplished and the powers exercised.[2]

History of the March JPA

In 1993, the federal government, through the Defense Base Closure and Realignment Commission, mandated the realignment of March Air Force Base (AFB), resulting in a substantial reduction in its military use. The County of Riverside (County) and the cities of Moreno Valley, Perris and Riverside (Cities) are all the jurisdictions abutting March AFB. In preparation for the March AFB realignment, the County and Cities entered into the "Joint Powers Agreement for the Formation of a Joint Powers Authority to Formulate and Implement Plans for the Use and Reuse of March Air Force Base" (March JPA Agreement) in September 1993, and thereby created March JPA. The March JPA Agreement has subsequently been amended and restated numerous times.

In April 1996, March AFB was redesignated as an Air Reserve Base (ARB). The decision to realign March AFB resulted in approximately 4,400 acres of property and facilities being declared surplus and available for disposal actions. In March 1997, the County and Cities entered into the 6th Amended March JPA Agreement. Section 1 (Purpose) was amended to add that one of the express purposes of the JPA Agreement is for:

> "… Planning and implementing the development of land in the area covered by the March 'Master Reuse Plan', including the preparation and adoption of a General Plan and/or a Specific Plan, the preparation and adoption of zoning and other land development standards, the preparation and adoption of health and safety codes related to development activities, and the implementation of these functions through the creation of appropriate Boards and Commissions pursuant to California law."

Through this 6th Amendment of the March JPA Agreement, March JPA assumed land use control for all surplus property identified. Pursuant to the March JPA Agreement, in the intervening years, March JPA has adopted a General Plan, Development Code, and approved multiple development entitlements within the March JPA planning area.

[1] Government Code Section 6507.
[2] Government Code Sections 6503 and 6508.

Reversion of March JPA's Land Use Authority

In April 2023, the County and Cities entered into the 14th Amendment to the March JPA Agreement, which removes March JPA's land use authority effective July 1, 2025. When a power is removed from a JPA, that power is "transferred back" or "restored to" the entity that originally held it. In this case, the land use authority the County held over the March JPA planning area as unincorporated County land was given to the March JPA in 1997. In July 2025, when land use powers are removed from the March JPA, the County will again hold and exercise land use authority over the unincorporated County territory,[3] including responsibilities related to the implementation of the Project and enforcement of the Project conditions of approval and mitigation measures. Additionally, the County, as March JPA's successor in interest, will enforce the provisions of the Project's Development Agreement.

Ongoing Maintenance

Multiple comments expressed concerns about ongoing maintenance. Under Section 7.9, Maintenance Plan, of the proposed Specific Plan, the public and private improvements constructed within the Specific Plan Area will be maintained through a combination of public and private entities as described in Table 7-1, Maintenance Responsibilities. The Specific Plan Area will be annexed into the Meridian Landscaping and Lighting Maintenance District (LLMD). Table 7-1 provides a list of maintenance entity options that fund and/or maintain facilities within the Specific Plan, including a Community Facilities District (CFD), or other special district pursuant to the Mello-Roos Community Facilities District Act of 1982.

[3] County staff report regarding the 14th Amendment to the March JPA Agreement – Board of Supervisors meeting – 4/18/2023; http://riversidecountyca.iqm2.com/Citizens/FileOpen.aspx?Type=30&ID=134955.

9.1.10 Topical Response 10 – West March Development and Disposition Agreement

The topical response addresses comments regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA), so as not to be repeated in each individual response, but rather cross-referenced in individual letter responses where applicable.

DDA Background

On December 27, 2001, the March Joint Powers Redevelopment Agency entered into the DDA with LNR Riverside, LLC (LNR) for the redevelopment of properties west of the I-215 freeway known as "West March". The DDA was established for the purpose of implementing the March Air Force Base Redevelopment Plan by providing a method of disposition and development on real properties west of the I-215 freeway consistent with the 1999 Master Environmental Impact Report for the March JPA General Plan. The DDA sets forth the procedures that must be followed when transferring ownership rights.

On May 1, 2006, the First Amendment to the DDA was adopted to incorporate Parcel D-3 West into the boundaries of the West March Planning Area and to ensure consistency with an Instrument of Release by the Federal Aviation Administration. Following state legislation dissolving redevelopment agencies in 2011, the March Joint Powers Redevelopment Agency assigned all of its interest in the DDA to March JPA as the successor entity to the Agency. On August 7, 2015, LNR's rights under the DDA were assigned in part to Meridian Park, LLC.

Second Amendment to the DDA

At its October 26, 2022, meeting under Agenda Item 9(1), the March Joint Powers Commission approved the Second Amendment to the DDA, which was an administrative clarification of the DDA and only modified financing terms. As stated in the Notice of Exemption filed by March JPA on October 27, 2022, the Second Amendment was not a project under CEQA as it did not propose or approve any changes in existing or potential future development as analyzed in the 1999 Master Environmental Impact Report for the March JPA General Plan; it did not alter or amend any binding land use plans within the March JPA planning area; and it did not entitle or otherwise commit to any changes in physical development under the jurisdiction of March JPA. Environmental review under CEQA was not required because the Second Amendment was merely the "continuing administration" of the existing DDA; a "government fiscal activity" which did not involve any commitment to any specific project impacting the environment; and an "administrative activity by government" that would not impact the environment. (State CEQA Guidelines § 15378(b)(2), (4), and (5).) It was not a pre-decisional commitment to the development being specifically analyzed in this EIR.

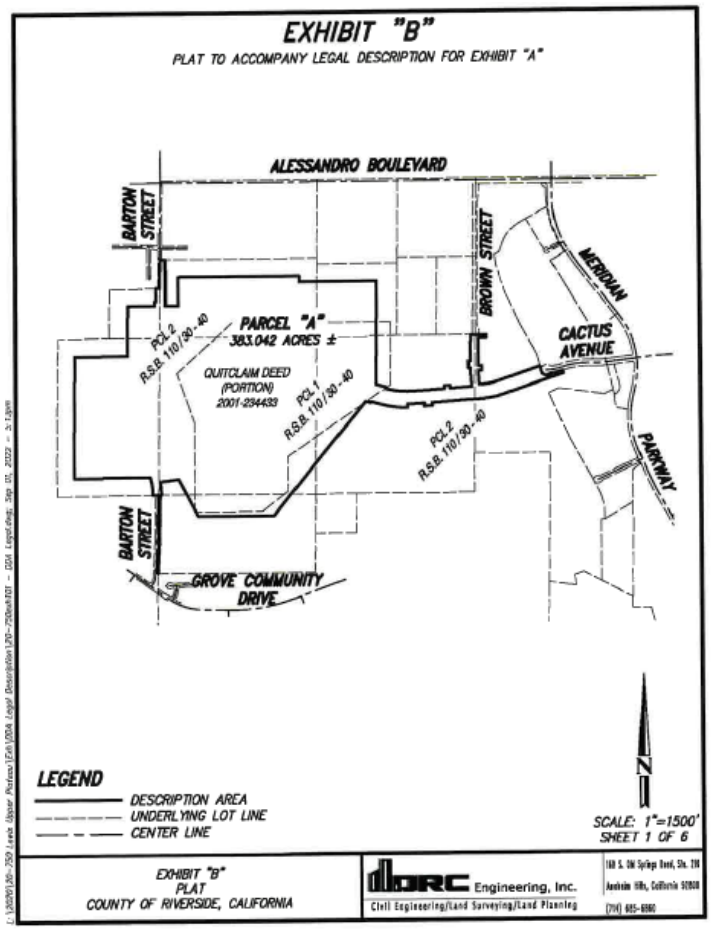
Partial Assignment of DDA

Under Section 12.02, Assignment of Agreement, of the DDA, Meridian Park, LLC may assign all, or any, portion of the property to an assignee through an assignment of agreement with the consent of March JPA. March JPA may refuse to give its consent only if, in light of the proposed assignee's reputation and financial resources, such assignee would not, in March JPA's reasonable opinion, be able to perform the obligations proposed to be assumed by such assignee.

At its February 8, 2023, meeting, under Agenda Item 8(11), March JPA staff recommended the March Joint Powers Commission concur with the Partial Assignment of the DDA from Meridian Park, LLC, to Meridian Park Upper Plateau, LLC (Partial Assignment). The Commission continued the agenda item. At its March 22, 2023, meeting,

the Commission again considered the Partial Assignment under Agenda Item 9(3). The Commission approved the concurrence. As stated in the 3/22/2023 Commission minutes, environmental review under CEQA was not required because March JPA's concurrence with the Partial Assignment was merely "a formality as per" the existing DDA and "ministerial." (Public Resources Code § 21080; State CEQA Guidelines § 15369.) It was not a pre-decisional commitment to the development being specifically analyzed in this EIR. As clearly stated in March JPA's Consent to Partial Assignment:

> ASSIGNOR AND ASSIGNEE ACKNOWLEDGE AND AGREE THAT AUTHORITY'S CONSENT TO THE PARTIAL ASSIGNMENT DOES NOT CONSTITUTE A PROJECT APPROVAL IN CONNECTION WITH ALL OR ANY PORTION OF THE PROPERTY.



Commenters alleged the Partial Assignment was inconsistent with the March JPA General Plan because Exhibit B of the Partial Assignment shows the extensions of Barton Street and Brown Street, which are not included in the Exhibit 2-1, Transportation Plan (Planned Roadway/Street System), of the General Plan. Exhibit B of the Partial Assignment, shown below, labels the existing sections of Barton Street and Brown Street. The Description Area shown includes the land proposed for the Barton and Brown Street extensions, but the Partial Assignment did not constitute the approval by March JPA of those extensions. The Project proposes to amend Exhibit 2-1 of the March JPA General Plan to include the Barton and Brown Street extensions.

Commenters also alleged the Partial Assignment was inconsistent with the March AFB Master Reuse Plan. As discussed in Recirculated Section 4.10, Land Use and Planning, the Master Reuse Plan and its Environmental Impact

Statement were the final documents regarding former AFB property reuse and disposal. The Preferred Land Use Pattern of the Master Reuse Plan served as the basis for the March JPA General Plan. The Master Reuse Plan remains an important document for historical purposes but does not control land use development decisions within the March JPA Planning Area. As described in the Final Master EIR for the March JPA General Plan (MEIR), the March JPA General Plan and the MEIR are the establishing documents to guide the planning process within the March JPA Planning Area and "can be termed as functioning or 'living' documents through their implementation." As discussed above, the Partial Assignment did not constitute the approval by March JPA of the Brown and Barton Street extensions.

No changes or revisions to the Draft EIR are required with regard to the comments raised about the DDA.

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9.2 Agency Responses to Comments

Comment Letter	Name	Date
Agencies		
A-1	Western Municipal Water District	1/27/2023
A-2	Agua Caliente Band of Cahuilla Indians	2/7/2023
A-3	Riverside Transportation Authority	2/14/2023
A-4	City of Moreno Valley	3/2/2023
A-5	SoCal Gas	3/7/2023
A-6	Pechanga	3/9/2023
A-7	Riverside County TLMA	3/9/2023
A-8	SCAQMD	3/9/2023
A-9	City of Riverside	3/10/2023
A-10	City of Riverside Ward 2 Councilmember Cervantes	3/10/2023
A-11	Riverside County Fire Department	3/10/2023; 4/29/2023

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Comment Letter A-1

WESTERN MUNICIPAL WATER DISTRICT

Craig D. Miller
General Manager

Mike Gardner Division 1 | Gracie Torres Division 2 | Brenda Dennstedt Division 3 | Laura Roughton Division 4 | Fauzia Rizvi Division 5

January 27, 2023

SENT VIA EMAIL

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Pkwy., Suite 140
Riverside, CA 92518
fairbanks@marchjpa.com

CONDITIONS OF APPROVAL
DEVELOPMENT PROJECT: MERIDIAN WEST CAMPUS UPPER PLATEAU DRAFT EIR

These Conditions of Approval for the above referenced Development Project ("project") are in response to the Specific Plan dated January 11, 2023. The project property is located within the water and sewer service area of the Western Municipal Water District ("Western"). The following are Western's Conditions of Approval:

1. All applicable Water and Sewer Connection Fees (Capacity Charges) and Meter Installation Fees, must be paid prior to the installation of any water meter.

2. Proposed facilities for water and sewer service must be designed by a Registered Civil Engineer, and reviewed and approved by the Western. Plan Check and Inspection Deposits are required prior to approval of the plans.

3. Developer's landscape architect is required to meet landscape and irrigation requirements of the agency of jurisdiction.

4. The property is located within the 1837 Pressure Zone. Currently, Western has an existing 24-inch water pipeline located Cactus Avenue. The available fire flow must be determined by fire flow modeling and/or physical flow from a fire hydrant within the vicinity of the project. Developer's civil engineer can find the pressure zones available water storage for fire flows in Western's Water Master Plans. Available storage should be compared to fire flow requirements by the fire protection agency of jurisdiction.

5. The January 18, 2023 Final Technical Memorandum for the Meridian Upper Plateau Water, Recycled Water, Sewer Analysis was prepared by Dudek to determine impacts to the water, sewer, and

A-1.1

recycled water systems due to the Project. This memorandum identified improvements that would be required to be able to provide service to the Project while meeting Western's standards. The improvements required to be in place prior to any service being provided to the Project include:

Potable System

- Upsize 1,300 feet of 12-inch diameter pipe on Deercreek Drive to 16-inch;
- Upsize 700 feet of 12-inch on Barton St to 20-inch diameter pipe;
- Upsize 600 LF of existing 18-inch on Van Buren Blvd to 20-inch diameter pipe;
- Construct the onsite potable water distribution system;

Recycled System

- Construct a new 0.5 Million Gallon tank reservoir at the existing Orange Crest site;
- Construct a new 12-inch diameter pipeline from the new recycled water tank to the on-site recycled water system;
- Upsize the main supply line from the Cactus Avenue tie-in to the temporary tank to 12-inch diameter.
- Construct the onsite potable water distribution system;
- Private Irrigation pumps and local recycled water priming tanks or pneumatic tanks required anywhere pressures are projected to drop below 30 psi at the service lateral.

Sewer Collection System

- Construct the onsite sewer collection system;

These improvements are required to be designed and constructed by the Developer in compliance with all Western rules, regulations, standards and requirements, and accepted by Western with all related costs and execution thereof to be the responsibility of the Developer.

The impacts to common use facilities that will need to be addressed prior to ultimate buildout include:

Potable System

- Accommodate increased deficit of 1.45-MG in storage for Ultimate Buildout demand condition due to the MWUP development demands.

Recycled System

- Accommodate increased deficit of 0.41-MG in storage for Ultimate Buildout demand condition due to the MWUP development demands.

Sewer System

- Accommodate increased deficit of 0.45-MGD in flow for Ultimate Buildout demand condition due to the MWUP development demands.

A-1.1 Cont.

These impacts are required to be addressed by the Project by either contribution of completed facilities to address the deficit as is the case for the proposed 0.5 MG tank for recycled water or by financial contribution in the form of Capacity Charges assessed to the project in proportion to the cost of the improvements required to address the project impacts.

There will be no credits or reimbursements available for infrastructure constructed.

6. Coordinate with the fire protection agency to determine required fire flow for proposed project and advise Western of the fire flow flow-rate and duration. Submit request to Western for fire flow modeling to determine if existing water systems capacity is available to provide the required fire flow. Depending on the results of the fire flow modeling additional conditions of approval such as upsizing of existing pipes, extension of pipes, installation of parallel piping or installation of pumps, and additional water storage at the developer's cost, may be required.

7. Developer to submit a 24" x 36" Preliminary Project Utility Plan of public and private onsite and offsite water, sewer and recycled water facilities (as applicable) to Western for review and approval before submittal of formal construction plan for plan check.

8. Preliminary Project Utility Plan shall show the following items:
    a. Provide basis of survey including benchmarks and horizontal control monuments with date, surveyor information, datum and basis of bearing.
    b. Delineate and label all existing utility facilities including potable water, sanitary sewer and recycled/non-potable water (i.e., pipe diameters, pipe material, manholes, water meters, air/vac, blow-off, fire hydrants, valves, gas, communication, electrical, and etc.) within project boundaries, along project boundaries and along areas of offsite improvements. Label any private streets and utilities as private. All other utilities will be considered as public utilities including utilities within easements and/or public right-of-way.
    c. Delineate all existing and proposed easements and right of ways within and along project boundaries. Label showing typical widths. Label owner of interest and purpose of easements. Proposed Western easements for potable water, sanitary sewer, and recycled/nonpotable water require a minimum of 30 feet in width.
    d. Delineate and label all proposed and existing lots, streets, and storm drains.
    e. Delineate all proposed water, sewer, and recycled/non-potable water facilities within project boundaries along frontages and offsite. Include pipeline diameters and type of material. Label any private proposed utilities as private.
    f. Commercial, Industrial and Residential projects are required to extend Western water and sewer along frontages and rights of ways of all streets abutting or surrounding the project's property boundary unless otherwise approved on this submitted Preliminary Project Utility Plan
    g. Water pipeline designed to be looped and valved such that no more than twenty parcels would be out of service during repairs to pipeline.

A-1.1 Cont.

h. The water pipelines shall extend across the full width of the frontage of the parcels where they are adjacent to a public right-of-way.
i. All water meters shall be placed within either a public right-of-way or Western easement, in front of the parcel to which it serves, at a distance no greater than 60 feet from the pipeline.
j. Sewer extension shall include factory wye's, stub lateral, and cap for existing properties along the extension.

9. Developer shall submit all Tentative Parcel or Tract Maps for the project to Western for review to determine whether additional project conditions are required.

10. Developer shall pay all costs associated with reviews of the Preliminary Master Utility Plan and Tentative Parcel or Tract Map by Western at the time of review.

11. Developer may be required to perform studies and analyses to provide the potable water and recycled/non-potable at maximum day demands and sanitary sewer maximum discharge needs of the development and their impacts on the relevant existing offsite potable water, recycled/non-potable and sanitary sewer systems at developers sole cost, as needed.

12. Provide and/or pay for all applicable cost and fees including connection fees (capacity charges), relocation of facilities, and additional facilities, including offsite pipeline extensions, additional potable water and recycled/non-potable water storage capacity, sanitary sewer treatment capacity and pumping facilities that may be necessary to accommodate applicant's proposed water, sewer and recycled/non-potable water usage (as applicable), while maintaining resiliency of pipelines within Western's distribution system. Western Master Plan Facilities, constructed by the developer may be subject to the application of appropriate capacity fee credits as deemed by Western.

13. Developer to submit a detailed engineer's construction cost estimate for proposed sewer and water facilities to Western for review and approval. Once approved, developer shall make a deposit for plan checking services for Water and/or Sewer Improvement Plans.

14. Water, Sewer, and Recycled Water Improvement Plans (as applicable) shall be designed per Western's Developer Handbook and Standard Specifications and available at: http://www.wmwd.com/158/Standard-Specifications-Drawings.

15. Developer to submit grading plans for Western's review and approval before grading permit is issued.

16. Water and/or Sewer Improvement Plans shall not be approved until all items mentioned above are received and approved by Western.

17. All abandoned well casings and septic systems shall be capped and logged in accordance with all applicable requirements of the Riverside County Department of Environmental Services.

A-1.1 Cont.

18. The developer is responsible for installing, paying all costs and obtaining an encroachment permit from the local jurisdiction having authority over installation of a water lateral in the public right-of-way. If the customer chooses to propose to route water or sewer pipelines across private property, then the customer is responsible to obtain easements from adjacent property owners. The easement shall be dedicated to Western.

19. For water, sewer and/or recycled water service by Western, the developer must comply with these standard conditions, and all applicable Rules, Regulations, and General Policies of Western found in Western's Municipal Water District Code at: https://www.codepublishing.com/CA/WMWD/

20. Subdivision maps shall be signed by Western and include Western's standard statements for sewer and water (as applicable). These statements acknowledge surety for water and sewer facilities and adequate property rights as required by Western standards.

A-1.1 Cont.

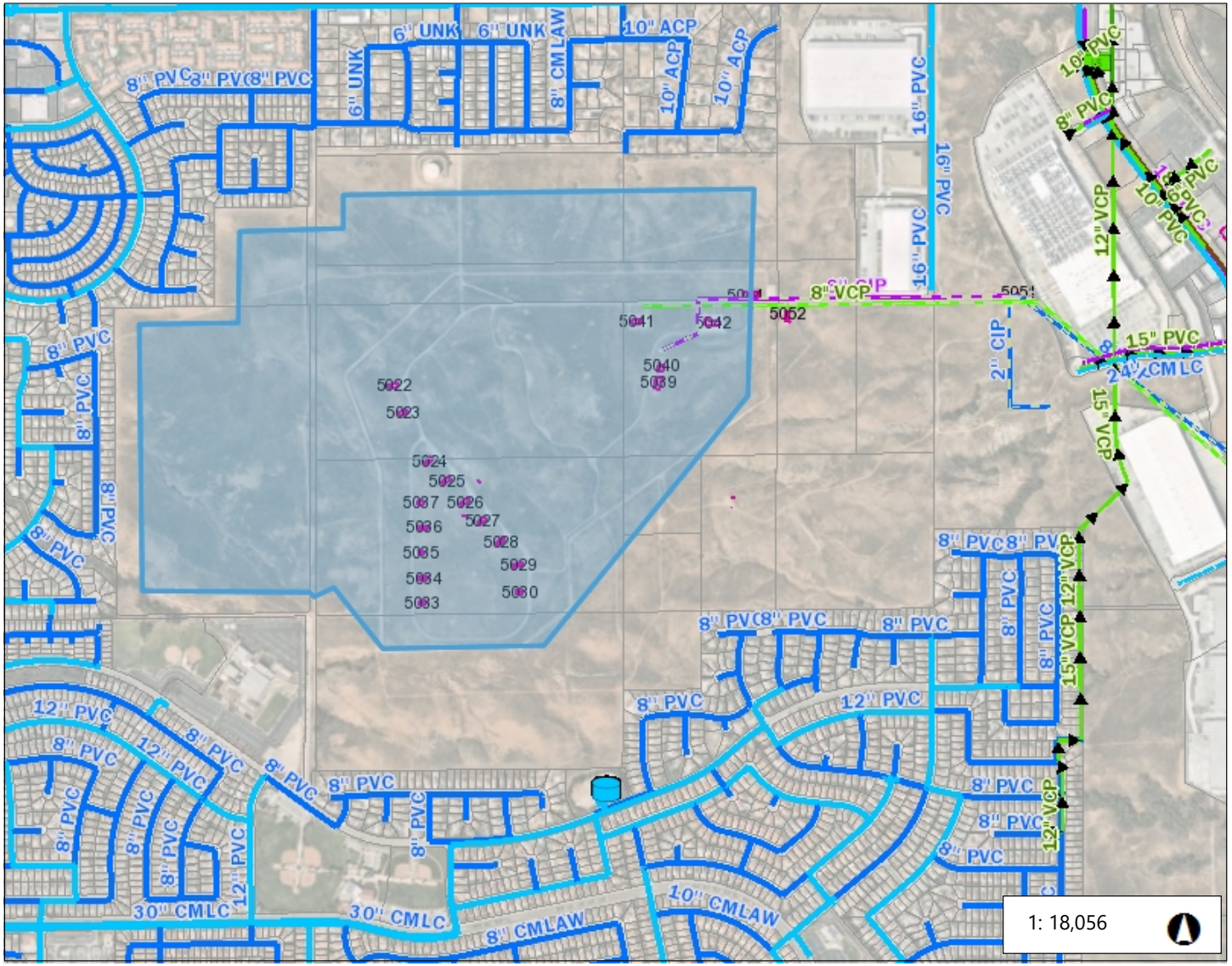
Western appreciates the opportunity to submit these Conditions of Approval, please contact Western's Development Services at (951) 571-7100 or development@wmwd.com for further information.

TERI PATTON
Senior Engineering Technician
Development Services

TP:kf:dk

Attachment(s): Western Municipal Water District GIS Exhibit
Dudek Final Technicial Memorandum

WMWD GIS Exhibit





Legend

- Water Main Line
  - Distribution
  - Transmission
  - Drain
- Sewer Mains
  - Force
  - Gravity
- Tentative Potable Tanks
- Tentative Potable Mains
  - TransmissionMain
  - DistributionMain
  - Bypass
- Tentative Recycled Pump Stati
- Tentative Recycled Tanks
- Tentative Recycled Main Lines
- Tentative Sewer Lift Stations
- Tentative Sewer Gravity Mains
  - Collector
  - Trunk
- Tentative Sewer Force Main
- Sewer Lift Stations
- Sewer Gravity Mains
  - Collector
  - Trunk
  - Inverted Siphon
- Abandoned Sewer Gravity Mai

Notes

Meridian West Campus Upper Plateau

0.6 0 0.28 0.6 Miles

WGS_1984_Web_Mercator_Auxiliary_Sphere

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This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
THIS MAP IS NOT TO BE USED FOR NAVIGATION

A-1.2

DUDEK
MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

FINAL TECHNICAL MEMORANDUM

To:	Karl Francis, WMWD; Derek Kawaii, WMWD
From:	Elizabeth Caliva, Dudek; Kate Palmer, Dudek; Jenny Li, Dudek
Subject:	Meridian Upper Plateau Water, Recycled Water, Sewer Development Analysis
Date:	January 18, 2023
cc:	Chris McKee, DRC Engineering; Adam Collier & Timothy Reeves, Lewis Retail Centers

1 Background, Goals & Objectives

The Riverside Service Area 2020 Facilities Master Plan (2020 FMP) for Western Municipal Water District (Western) was completed in November 2021. The 2020 FMP considered a large open space parcel in the northern portion of the service area to be developed as soccer fields, requiring recycled water service only. In 2022, a new specific plan was developed, called the Meridian West Upper Plateau (MWUP) Project for development in the near-term planning horizon, which would utilize the potable water, recycled water and sewer collection facilities of Western. No previous master plan or report had considered the impacts of the MWUP development on Western facilities. This report provides an update to the hydraulic models, applying specific water, recycled water and sewer demands and loadings based on the updated land use for the site.

The goal of this analysis is to identify the immediate and long-term project-specific needs of accommodating the MWUP development as well as determine the timing and sizing impact on the stated CIP project recommendations from the 2020 FMP. The objectives of this project include the following:

1. Update the three FMP hydraulic models with the most recent available information on the specific development plan for the MWUP development.

2. Determine if any improvements to the Western water, recycled water, and sewer facilities are required for immediate accommodation of the MWUP development.

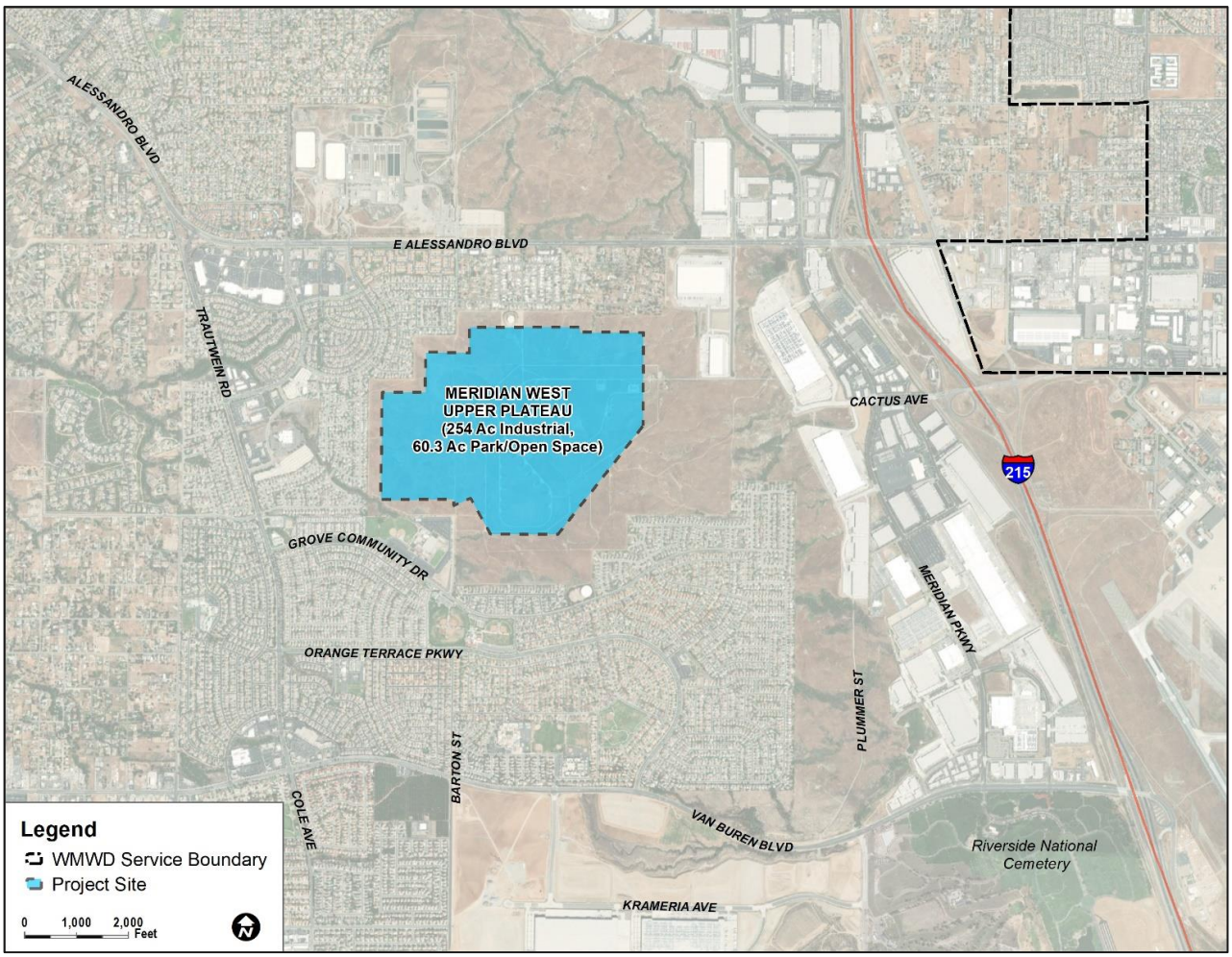
3. Determine changes to recommended CIP project timing and sizing from the 2020 FMP as a result of accommodating the MWUP development.

A-1.2 Cont.

2 Updated Land Use

The MWUP project is being developed on currently undeveloped land. In the 2020 FMP, the proposed land use type for the property was assumed to be soccer fields, with recycled water demand only. The updated proposed land use for the site includes 254 acres of Industrial and 60.3 acres of Park/Open Space. The location of the site is shown in Figure 1. Details of the site layout are included in Attachment A.

Figure 1. Location Map



A-1.2
Cont.

3 Hydraulic Analyses

The following sections detail the potable water, recycled water and sewer analyses and results

3.1 Potable Water Analysis

The proposed MWUP project would be served by the 1900 pressure zone (PZ). The potable water hydraulic analysis includes consideration of six (6) demand scenarios:

Demand Condition	Maximum Day Demand	Maximum Day Demand + Fire Flow
Existing (2020)	Scenario 1	Scenario 2
Near Term (2030)	Scenario 3	Scenario 4
Buildout	Scenario 5	Scenario 6

Three analyses will be performed to update the potable water system results from the 2020 FMP, including a storage analysis, a distribution system analysis and a pump station analysis. **Table 1** presents the updated net water use projections for the project site used for the analyses.

A-1.2 Cont.

Table 1. Updated Net Water Use Projections for the Project Site

Proposed Land Use	Acreage	Previous PW Demand (gpm)[1]	Proposed PW Average Day Demand (gpm)	Net ADD (gpm)	Net MDD (gpm)[2]
Industrial	254	0	352.8[3]	352.8	529.1
Park/Open Space	60.3	0	25.1[4]	25.1	37.7
		Total Net Increase in PW Demand:		**377.9**	**566.8**

Notes:
[1] In the 2020 FMP, the project site was anticipated to be developed into soccer fields in the Ultimate Buildout scenario only with no potable water demand anticipated for the site.
[2] MDD peaking factor is equal to 1.5 x ADD, per Table 3-3 of the 2020 FMP.
[3] Industrial potable water demand estimated using a water use factor of 2,000 gpd/acre.
[4] Park/Open Space potable water demand estimated using a water use factor of 600 gpd/acre.

3.1.1 Storage Analysis

Using the demand values from Table 1, an updated storage analysis was performed for the 1900 PZ. The results of the storage analysis for Existing, Near-Term and Buildout are presented in **Table 2**.

Table 2. Potable Water Storage Analysis for 1900 PZ

						Fire Storage				
Scenario	Pressure Zone	Existing Storage (MGD)	MDD (MGD)	Equalization 25% MDD (MG)	Emergency 100% MDD (MG)	Fire Flow (gpm)	Duration (hours)	Total (MGD)	Total Required (MG)	Surplus/ (Deficit) (MG)
Existing (2020)[1]	1900	13.6	6.75	1.69	6.75	3,000	3	0.54	8.98	4.63
Existing (2020) + MWUP	1900	13.6	7.57	1.89	7.57	4,000	4	0.96	10.42	3.18
Near-Term (2030) [2]	1900	13.6	8.75	2.19	8.75	3,000	3	0.54	11.48	2.12
Near-Term (2030) + MWUP	1900	13.6	9.57	2.39	9.57	4,000	4	0.96	12.92	0.68
Ultimate[3]	1900	13.6	10.96	2.74	10.96	3,000	3	0.54	14.24	(0.63)
Ultimate + MWUP	1900	13.6	11.78	2.94	11.78	4,000	4	0.96	15.68	(2.08)

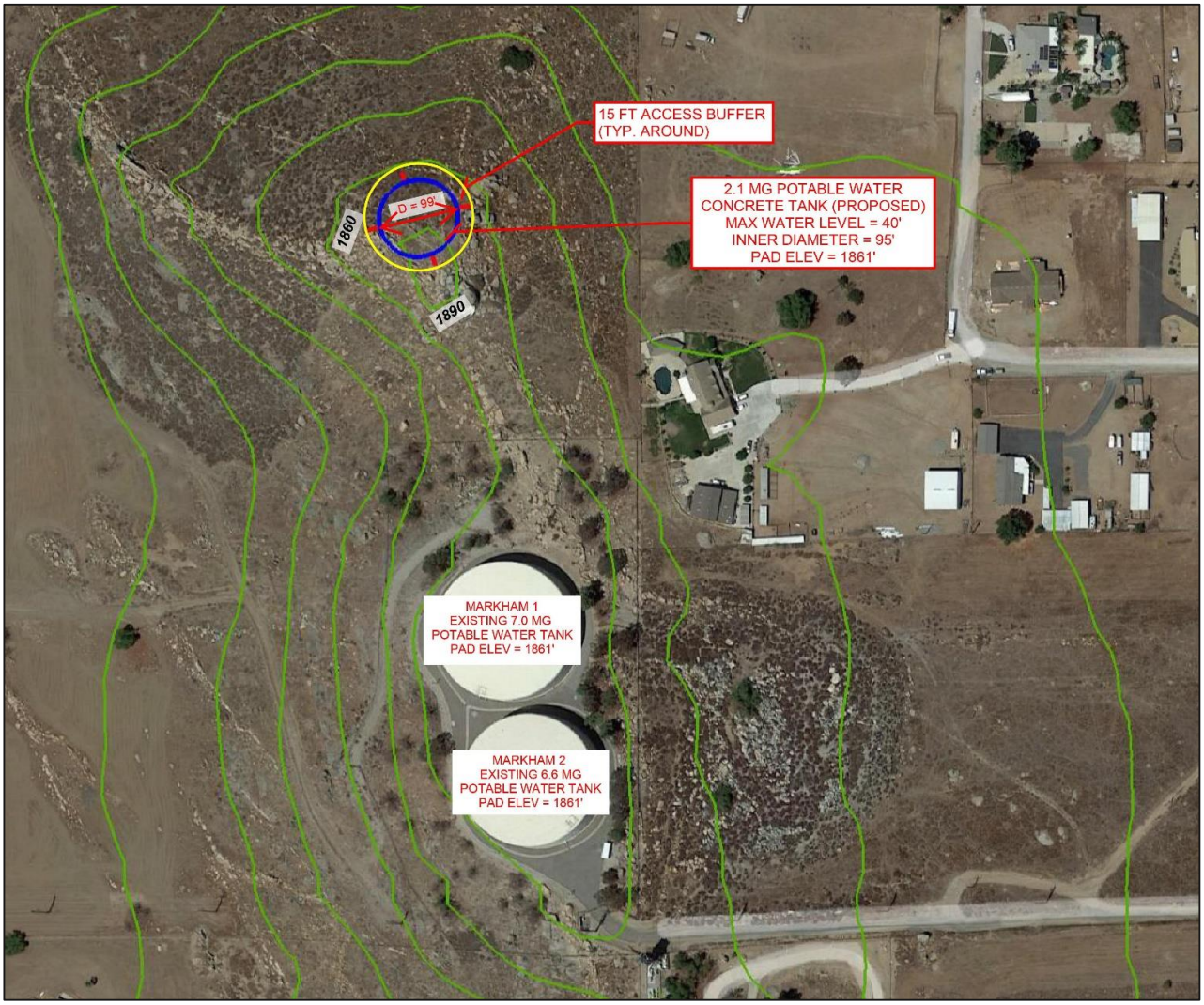
Notes:
[1] Data from Table 6-1 of the 2020 FMP.
[2] Data from Table 6-4 of the 2020 FMP.
[3] Data from Table 6-6 of the 2020 FMP.

A-1.2 Cont.

The above results indicate that there is sufficient storage anticipated in the Existing and Near-Term scenarios to accommodate the new MWUP development. However, the Ultimate Buildout scenario was previously anticipating a storage deficit in the 2020 FMP that would be further exacerbated by the MWUP development. The resulting storage deficit anticipated for Ultimate Buildout is increased to 2.08-MG, an increase of 1.45-MG from the 2020 FMP analysis, as a result of the new demands anticipated by the MWUP development.

Potential siting of a new 2.1-MG tank was evaluated as part of this study. **Figure 2** presents a potential location north of the existing Markham Tanks. Constructability would need to be addressed; location shown for potential siting purposes only.

Figure 2. Potential Siting of New 2.1-MG Reservoir for 1900 PZ



There are options to reduce storage needs, such as using reservoir management systems (RMSs) to maximize tank levels to minimize equalization volume requirements; however, this would require increased pumping during high

A-1.2 Cont.

time of use (TOU) hours. Western is exploring purchasing Tesla batteries for energy during high TOU times and this may be an option to consider for this application as well in an effort to use RMS to reduce equalization storage needs while also reserving pumping times for low TOU rate hours (overnight).

3.1.2 Distribution System Analysis

A MDD of 566.8 gpm was point loaded on model junction ID N512 at the intersection of Grove Community Drive and Deercreek Drive, which is the anticipated tie-in of the MWUP development to Western's potable water system to the 1900PZ. The parallel 12-inch piping considered by the developer for this tie-in location was not added to the model as it is anticipated one of the lines is for backup supply in case of a line break of the primary supply line. A 24-hour extended period simulation (EPS) was run in the model for MDD and MDD plus fire flow for the Existing (2020), Near-Term (2030) and Ultimate Buildout scenarios and results compared to District evaluation criteria, including a minimum service pressure of 40 psi during MDD, minimum residual pressure of 20 psi during fire flow, and a maximum pipeline velocity of 7.5 fps during either condition. The Near-Term and Buildout modeling scenarios included the improvements recommended as part of the 2020 FMP.

A-1.2 Cont.

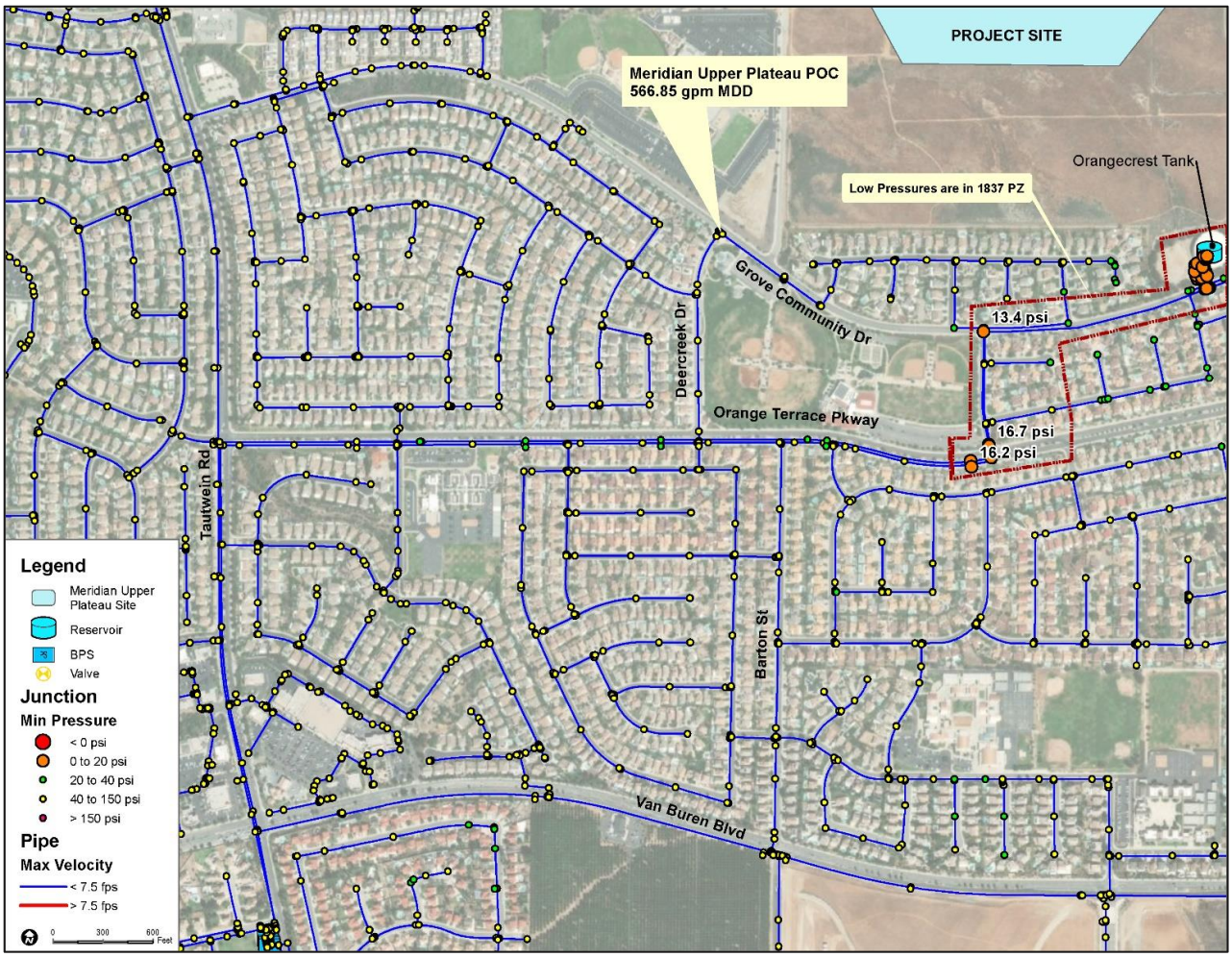
The goal of this analysis was to (1) identify what improvements the developer would need to construct as part of the initial MWUP development for potable water service within District criteria and (2) identify if any previously recommended projects from the master plan become triggered for earlier construction due to the additional demand of the development.

The following subsections provide the results of each scenario.

3.1.2.1 Scenario 1: Existing MDD

The existing MDD scenario results indicated that the 1900 PZ could accommodate the additional demand for the MWUP within design criteria. Minimum service pressure and maximum pipeline velocities are shown graphically on **Figure 3**. Note, the low pressures seen in Figure 4 southwest of the existing Orangecrest Tank are within the 1837 pressure zone and are unrelated to the MWUP development project.

Figure 3. Potable Water Existing (2020) with MWUP – MDD Minimum Pressures and Maximum Velocities

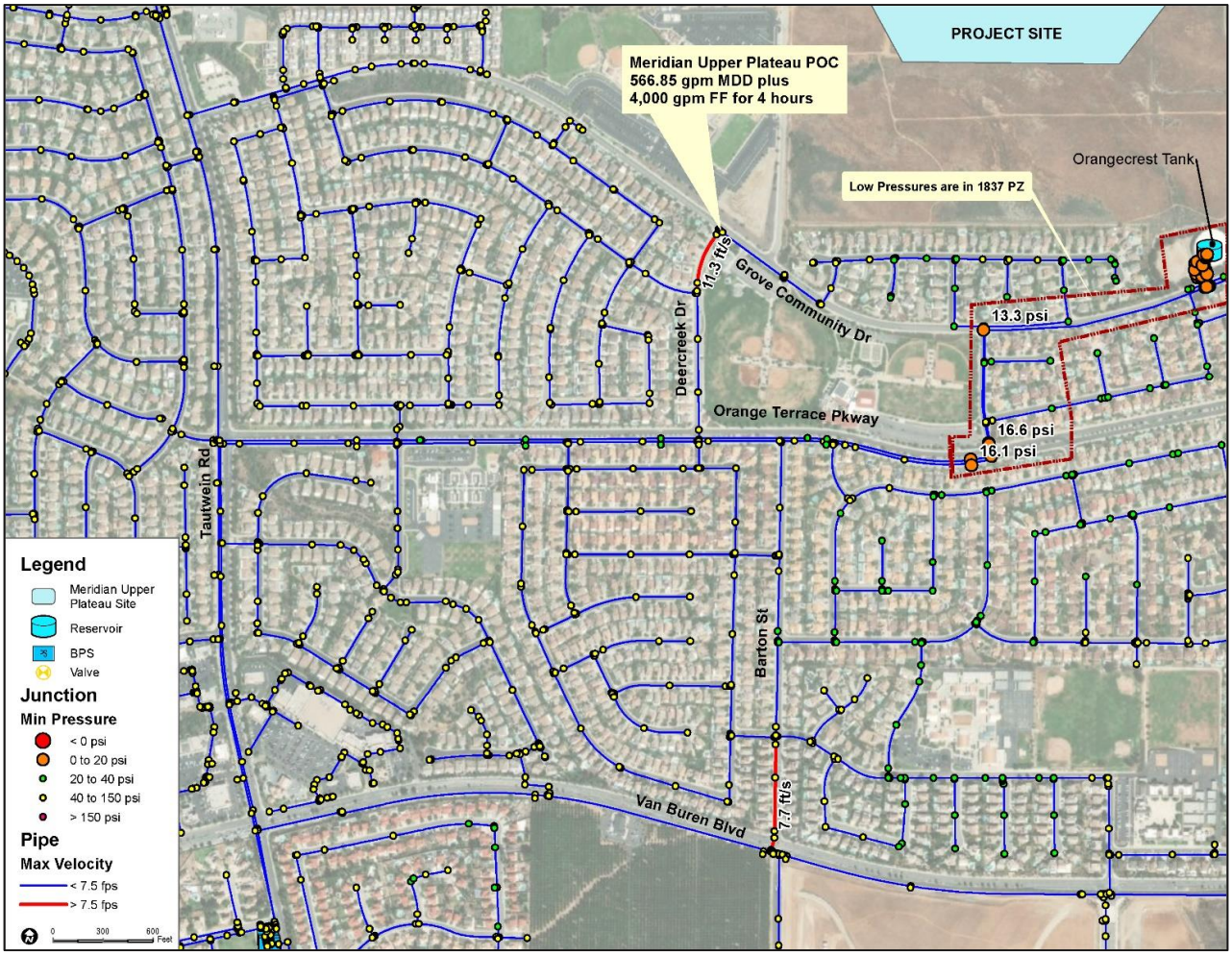


A-1.2 Cont.

3.1.2.2 Scenario 2: Existing MDD plus Fire Flow

The existing MDD plus fire flow scenario results indicates two pipelines within the 1900 PZ are anticipated to exceed Western maximum pipeline velocity requirements, as shown graphically on **Figure 4**. The model indicated the existing 12-inch pipeline at the tie-in location is anticipated to have maximum pipeline velocities in excess of 11 fps. Additionally, an existing 12-inch pipeline in Barton Street north of Van Buren Blvd is anticipated to have maximum velocities during fire flow at 7.7 fps, which exceeds the district criteria of 7.5 fps.

Figure 4. Existing (2020) with MWUP – MDD plus Fire Flow Minimum Pressures and Maximum Velocities

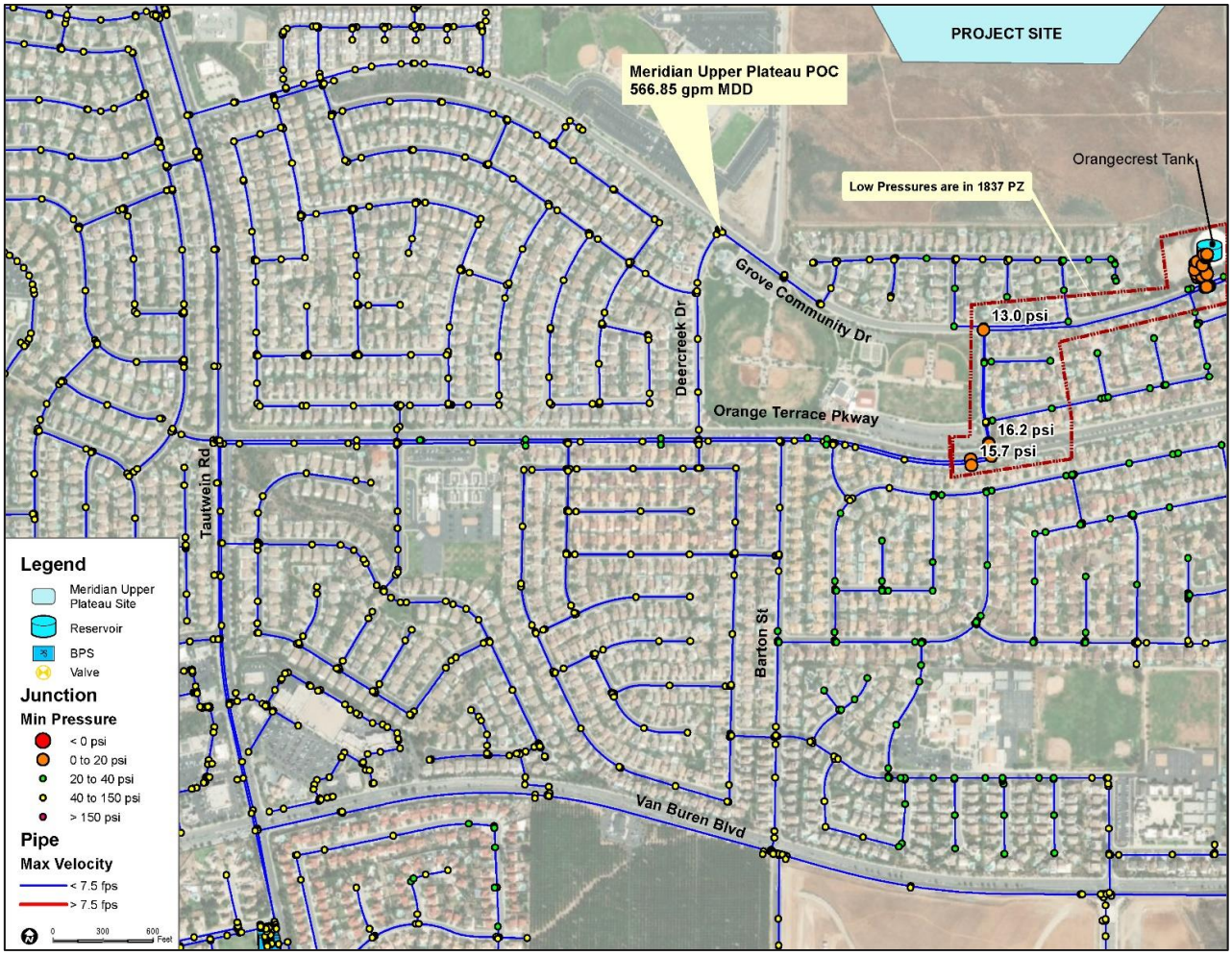


A-1.2 Cont.

3.1.2.3 Scenario 3: Near-Term MDD

Under the Near-term MDD demand scenario, no potable water facilities are anticipated to exceed Western criteria, as shown in **Figure 5**. Note, the low pressures seen in Figure 4 are within the 1837 pressure zone and are unrelated to the MWUP development project.

Figure 5. Potable Water Near-Term (2030) with MWUP – MDD Minimum Pressures and Maximum Velocities

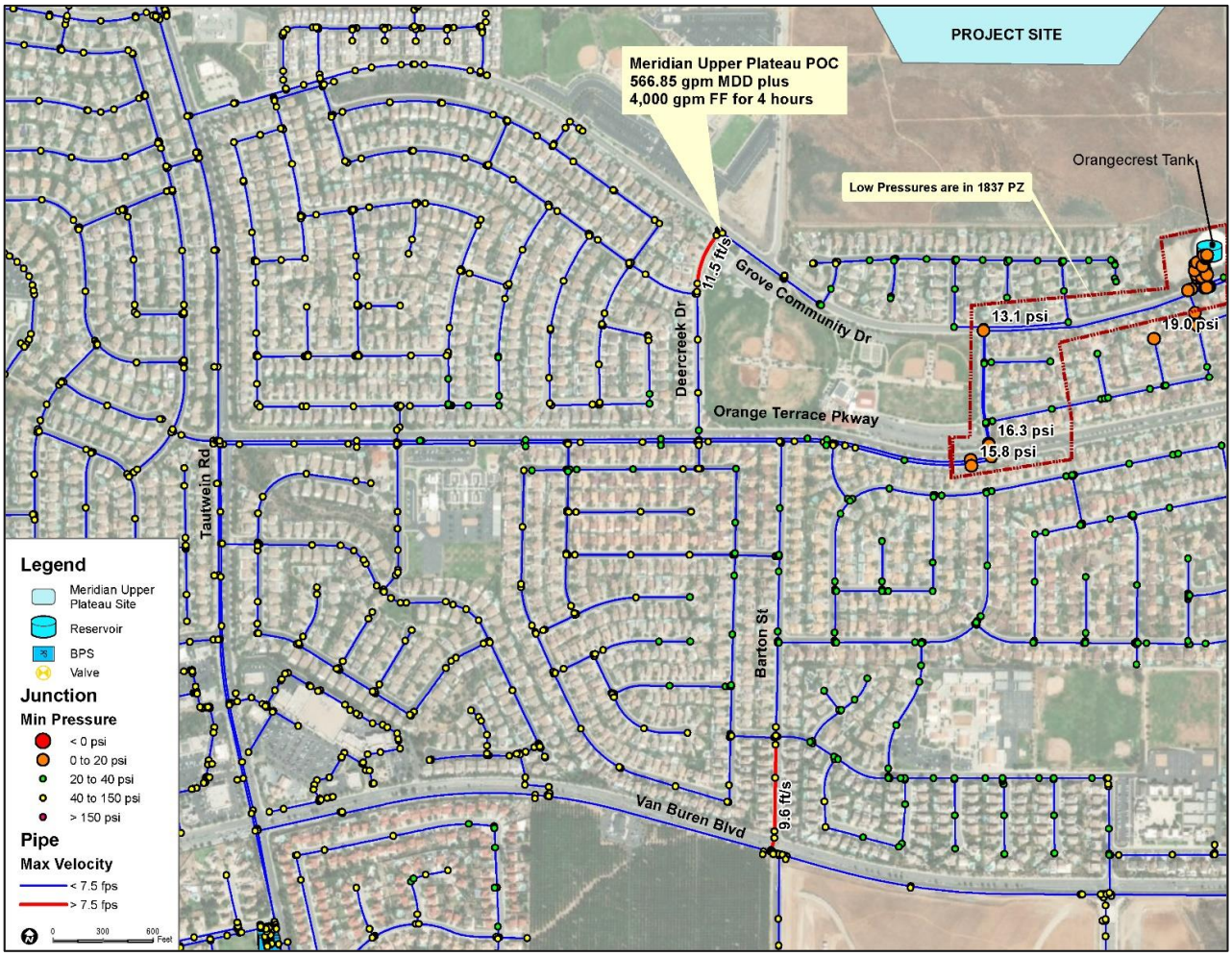


A-1.2 Cont.

3.1.2.4 Scenario 4: Near-Term MDD plus Fire Flow

The Near-Term MDD plus fire flow scenario results indicates two pipelines within the 1900 PZ are anticipated to exceed Western maximum pipeline velocity requirements, as shown graphically on **Figure 6**. The model indicated the existing 12-inch pipeline at the tie-in location is anticipated to have maximum pipeline velocities in excess of 11 fps. Additionally, an existing 12-inch pipeline in Barton Street north of Van Buren Blvd is anticipated to have maximum velocities during fire flow at approximately 9.6 fps.

Figure 6. Near-Term (2030) with MWUP – MDD plus FF Minimum Pressures and Maximum Velocities

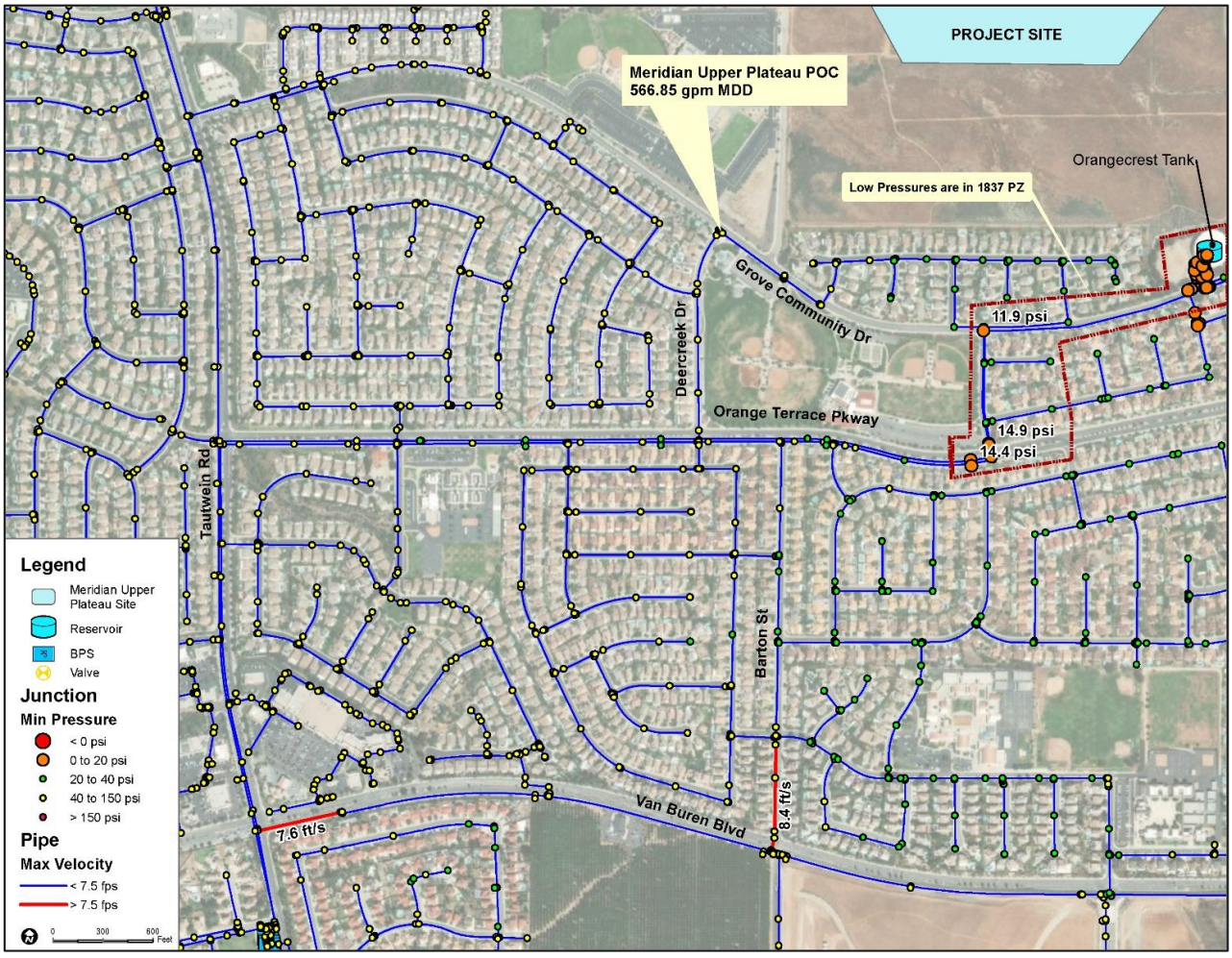


A-1.2 Cont.

3.1.2.5 Scenario 5: Ultimate Buildout MDD

The Ultimate Buildout MDD scenario results indicate two pipelines within the 1900 PZ are anticipated to exceed Western maximum pipeline velocity requirements, as shown graphically on **Figure 7**. The model indicated the existing 12-inch pipeline in Barton Street north of Van Buren Blvd is anticipated to have maximum velocities during fire flow at approximately 8.4 fps. Additionally, an existing 18-inch pipeline in Van Buren Blvd just east of Tautwein Road is anticipated to slightly exceed the maximum velocity requirement of 7.5 fps.

Figure 7. Ultimate Buildout with MWUP – MDD Minimum Pressures and Maximum Velocities

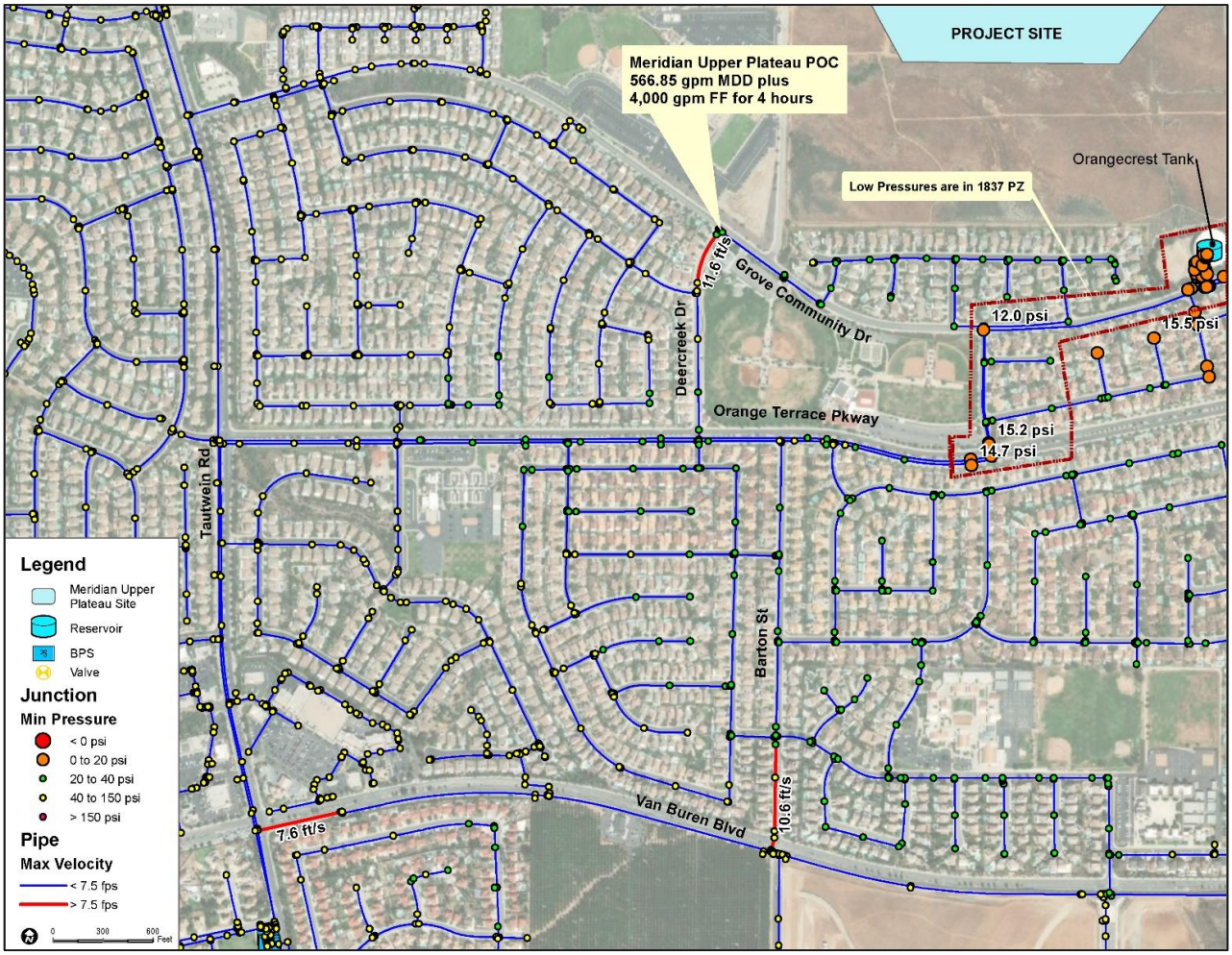


A-1.2 Cont.

3.1.2.6 Scenario 6: Ultimate Buildout MDD plus Fire Flow

The Ultimate Buildout MDD plus fire flow scenario results indicates three pipelines within the 1900 PZ are anticipated to exceed Western maximum pipeline velocity requirements, as shown graphically on **Figure 8**. The model indicated the existing 12-inch pipeline at the tie-in location is anticipated to have maximum pipeline velocities in excess of 11 fps. An existing 12-inch pipeline in Barton Street north of Van Buren Blvd is anticipated to have maximum velocities in excess of 10 fps. Additionally, the existing 18-inch pipeline in Van Buren east of Tautwein Road is anticipated to slightly exceed the maximum velocity requirement of 7.5 fps.

Figure 8. Ultimate Buildout with MWUP – MDD plus FF Minimum Pressures and Maximum Velocities



A-1.2 Cont.

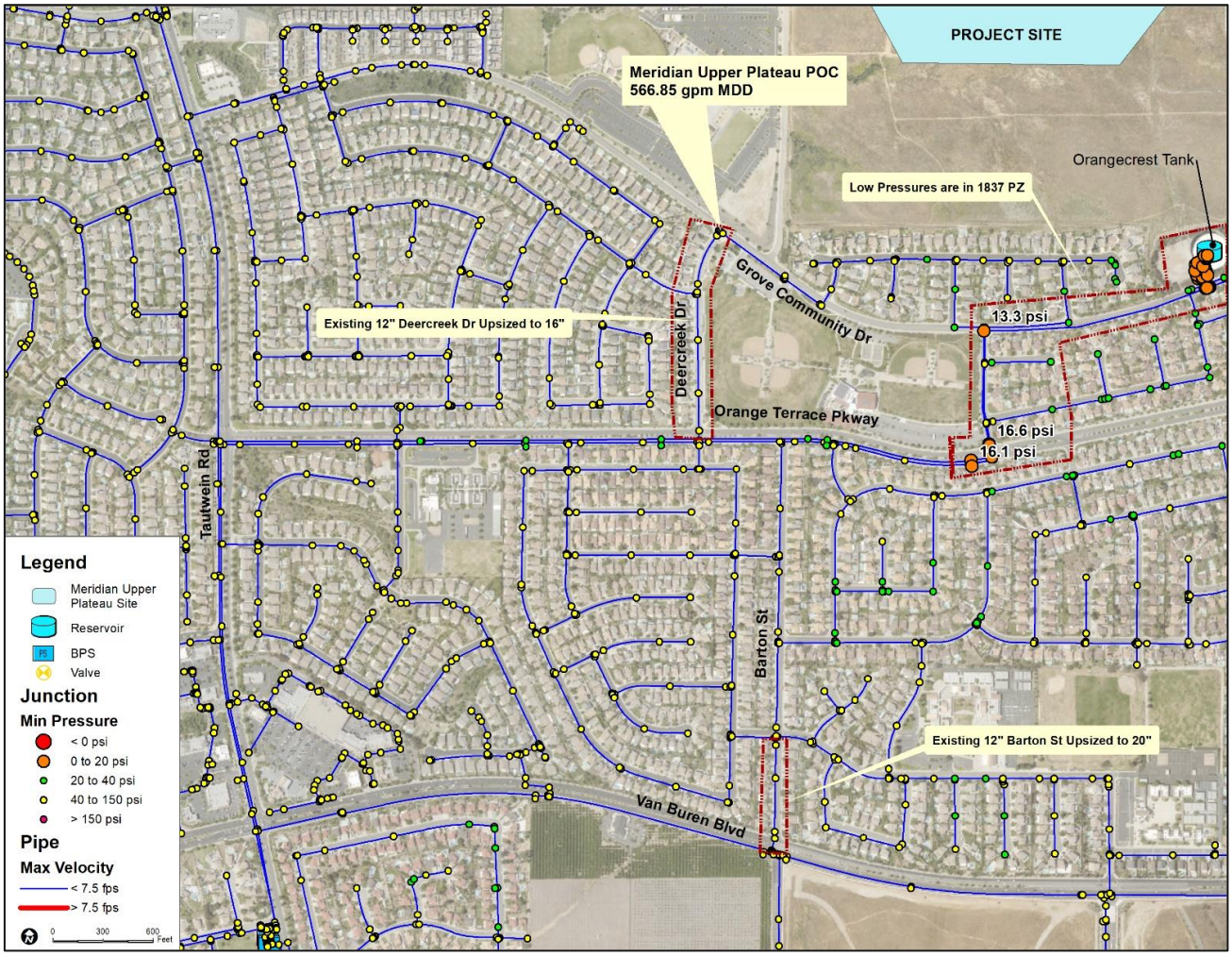
3.1.2.7 Results with Improvements

System improvements were evaluated to maintain facilities within Western design criteria under MDD plus fire flow conditions for the Existing (2020), Near-Term (2030) and Ultimate Buildout demand scenarios. The following improvements are recommended for the potable water system:

- Upsize 1,300 LF of 12-inch on Deercreek Drive to 16-inch
- Upsize 700 LF of 12-inch on Barton St to 20-inch
- Upsize 600 LF of existing 18-inch on Van Buren Blvd to 20-inch (scenarios 2030 and Buildout only)

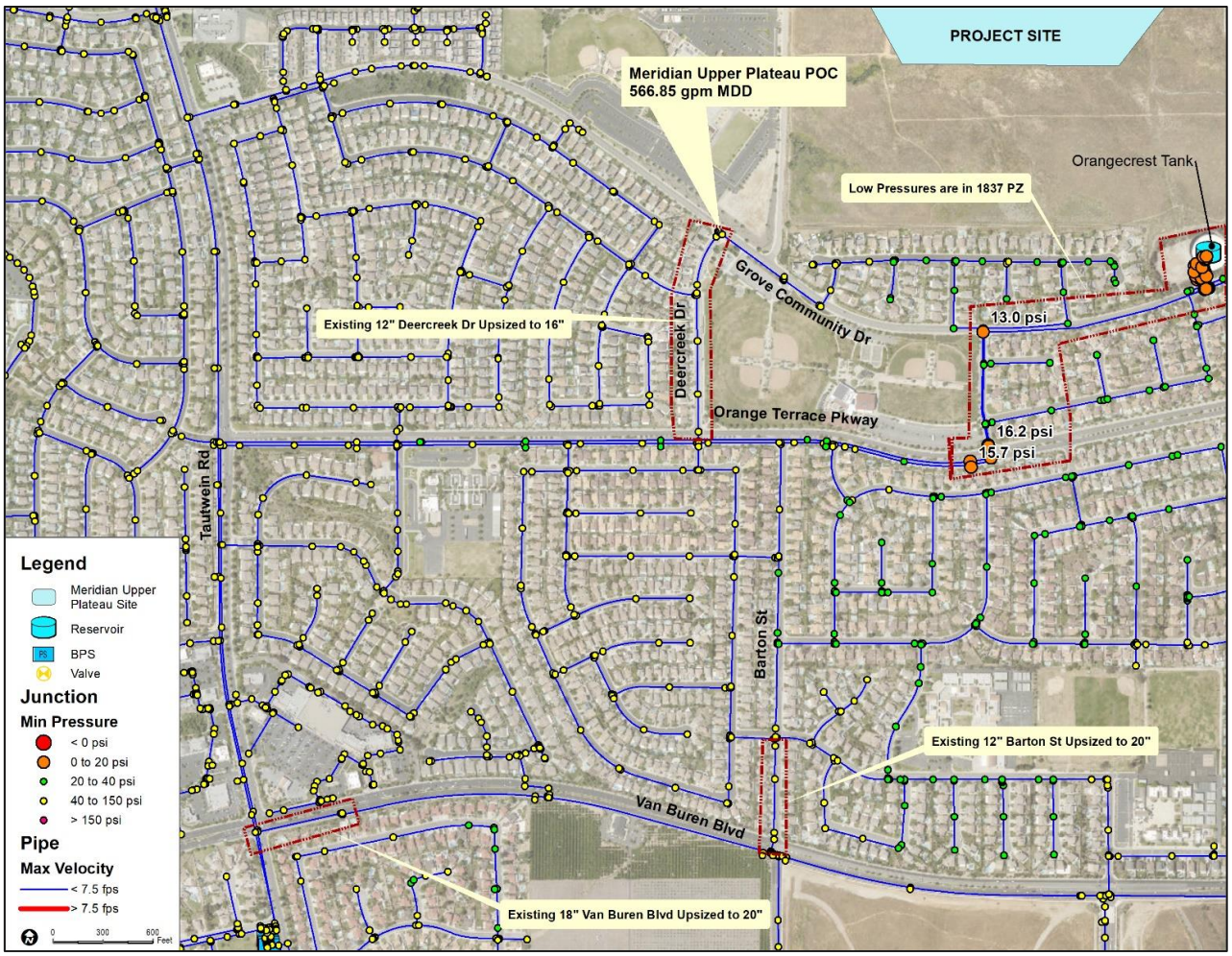
The results of the system analyses with improvements are shown in **Figures 9**, **10** and **11**.

Figure 9. Existing (2020) with MWUP – MDD plus Fire Flow with Improvements



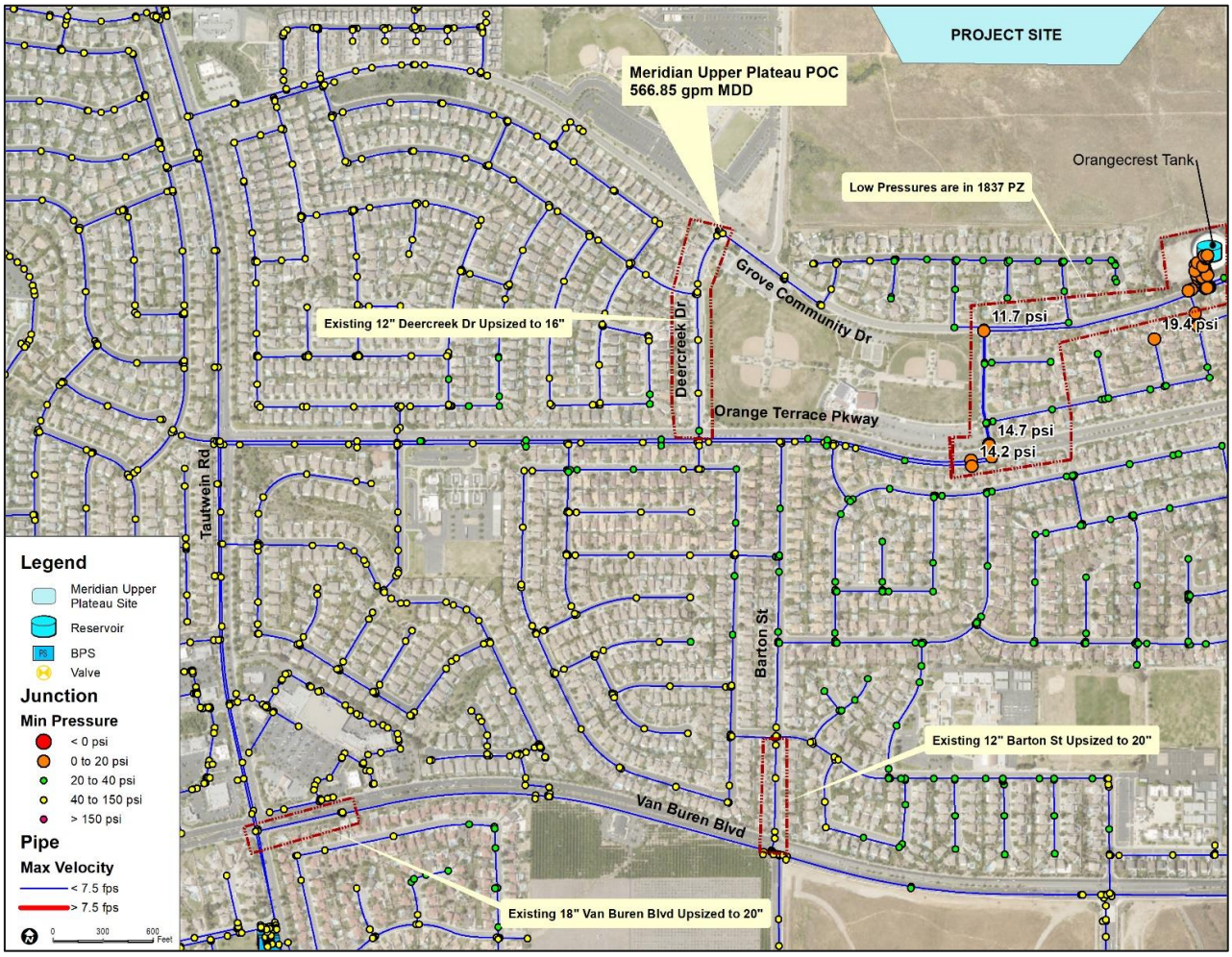
A-1.2 Cont.

Figure 10. Near-Term (2030) with MWUP – MDD plus FF with Improvements



A-1.2 Cont.

Figure 11. Ultimate Buildout with MWUP – MDD plus FF with Improvements



A-1.2 Cont.

3.1.3 Potable Water Pump Station Analysis

An updated pump station analysis was performed for the Bergamont Pump Station, which supplies the 1900PZ from the 1837 PZ. The pump station currently has four (4) pumps with a total pumping capacity of 18,900 gpm and a firm capacity (largest pump out of service) of 12,000 gpm. The design criteria for potable water pump stations requires that the firm pumping capacity meet the MDD for each pressure zone. As shown in **Table 3**, the results of the analysis indicate that the Bergamont Pump Station is anticipated to have sufficient capacity to accommodate the MWUP through Buildout with no improvements required.

Table 3. Potable Water Pump Station Analysis for the 1900PZ

Scenario	Pressure Zone	Zone MDD (MGD)	Zone MDD (gpm)	Bergamont Firm Capacity (gpm)1	Surplus (gpm)
Existing (2020)	1900	6.75	4,700	12,000	7,300
Existing (2020) + MWUP	1900	7.57	5,300	12,000	6,700
Near-Term (2030)	1900	8.75	6,100	12,000	5,900
Near-Term (2030) + MWUP	1900	9.57	6,600	12,000	5,400
Ultimate	1900	10.96	7,600	12,000	4,400
Ultimate + MWUP	1900	11.78	8,200	12,000	3,800

Notes:
[1] Assumes largest pump out of service. Value from Table 6-3 of the 2020 FMP.

3.1.4 Potable Water Analysis Summary

The results of the potable water analysis indicate that several existing waterlines are anticipated to exceed Western evaluation criteria with the addition of the MWUP demand. The following water system pipeline improvements are recommended to maintain maximum waterline velocities below the design criteria of 7.5 fps.

The following potable water improvements are required to accommodate the immediate construction of the MWUP development:

- Upsize 1,300 LF of 12-inch on Deercreek Drive from Grove Community Drive to Orange Terrace Parkway to 16-inch.
- Upsize 700 LF of 12-inch on Barton St north of Van Buren to 20-inch.

The following are additional future (2030 and Buildout) potable water system recommendations not previously included in the 2020 FMP necessary to accommodate the MWUP development:

- Upsize 600 LF of existing 18-inch on Van Buren Blvd east of Tautwein Rd to 20-inch (for future scenarios 2030 and Buildout only).
- Accommodate increased deficit of 1.45-MG in Ultimate Buildout demand condition due to the MWUP development demands.

3.2 Recycled Water Analysis

The MWUP project is proposed to be served by the 1815 PZ. The recycled water hydraulic analysis includes maximum day demand (MDD) be evaluated for the Existing (2020), Near-Term (2030) and Buildout scenarios. Three analyses will be performed to update the recycled water system results from the 2020 FMP, including a storage analysis, a distribution system analysis, and a pump station analysis. **Table 4** presents the updated net recycled water use projections for the project site used for the analyses.

A-1.2 Cont.

Table 4. Updated Net Recycled Water Use Projections for the Project Site

Proposed Land Use	Acreage	Previous RW Demand (gpm)[1]	Proposed RW Average Day Demand (gpm)	Net ADD Increase (gpm)	Net MDD Increase (gpm)[2]
Industrial	254	0	39.7[4]	39.7	99.2
Park/Open Space	78.1[3]	45.8	72.9[5]	27.1	67.9
			Total Net Increase in RW Demand:	**66.8**	**167.1**

Notes:

[1] In the 2020 FMP, the project site was anticipated to be developed into 30 acres of soccer fields in the Buildout scenario only.

[2] MDD peaking factor is equal to 2.5 x ADD, per Table 3-11 of the 2020 FMP.==

[3] This acreage value varies from the Park/Open Space acreage values for potable water and sewer because it includes some Landscape and Lighting Maintenance District (LLMD) areas (slope/landscape areas/maintenance roads) that would not have development but would have landscaping requiring a recycled water demand.

[4] Industrial recycled water demand estimated using a water use factor of 225 gpd/acre. Note: the water use factor provided by the developer used during the West Campus study in 2017/2018, which was 450 gpd/acre for Industrial for maximum month. The maximum month peaking factor in the 2020 FMP for recycled water is 2.0. Therefore, the average day demand water use factor assumed herein is 225 gpd/acre.

[5] Park/Open Space recycled water demand estimated using a water use factor of 1,345 gpd/acre. Note: the water use factor provided by the developer used during the West Campus study in 2017/2018, which was 2,690 gpd/acre for Park/Open Space for maximum month. The maximum month peaking factor in the 2020 FMP for recycled water is 2.0. Therefore, the average day demand water use factor assumed herein is 1,345 gpd/acre.

A-1.2 Cont.

3.2.1 Storage & Siting Analysis

As discussed in the 2020 FMP, recycled storage in the 1815 PZ is currently in deficit by approximately 2.4MG. As a part of development, the MWUP project will be constructing a temporary bolted steel reservoir to accommodate the storage required for their development. Per the 2020 FMP, required recycled water storage is equal to one MDD. Therefore, the required storage for the MWUP is a minimum of 0.41-MG.

Two sites were proposed for the tank, including one site with a pad elevation of 1734 ft within the development and the existing Orangecrest site, with a pad elevation of 1799 ft. It was assumed a bolted steel tank with a maximum height of 32-ft would be constructed for the temporary storage. The site with the pad elevation of 1734-ft is unable to match the HGL of the existing Lurin Tank of 1815 ft. Therefore, the Orangecrest site is the preferred site for the temporary storage tank. In discussion with Western and the Developer, a tank with a diameter of 53.5 feet and maximum depth of 30 feet (total volume 0.5-MG) was assumed for the hydraulic analysis.

Using the updated recycled water demand values from Table 3, an updated storage analysis was performed for the 1815 PZ. The results of the storage analysis for Existing, Near-Term and Buildout are presented in **Table 5**. Note that the "Existing Storage" column for the Existing + MWUP scenario includes the temporary 0.5-MG tank constructed as part of the MWUP project. The Results indicate that the storage deficit predicted for the Ultimate Buildout demand condition will be exacerbated by the MWUP project.

Table 5. Recycled Water Storage Analysis for the 1815PZ

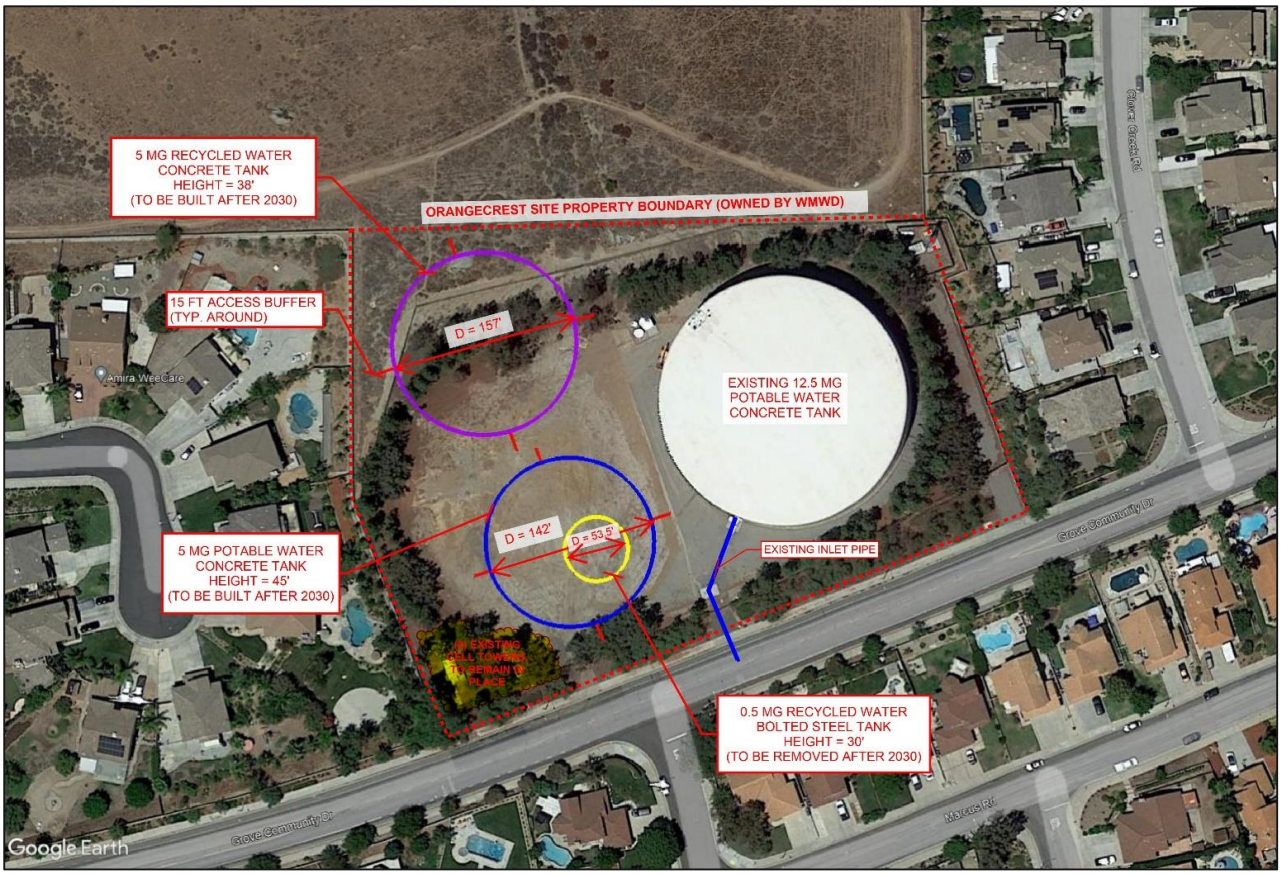
Scenario	Pressure Zone	Existing Storage (MGD)	MDD (MGD)	Required Storage (MG)	Surplus/ (Deficit) (MG)
Existing (2020)	1815	0.3	2.67	2.67	(2.37)
Existing (2020) + MWUP	1815	0.8[1]	3.08	3.08	(2.28)
Near-Term (2030)	1815	5.3[2]	4.63	4.63	0.67
Near-Term (2030) + MWUP	1815	5.3[2]	5.04	5.04	0.26
Ultimate	1815	5.3[2]	6.54	6.54	**(1.24)**
Ultimate + MWUP	1815	5.3[2]	6.95	6.95	**(1.65)**

Notes:
[1] Includes the 0.3-MG existing Lurin Tank and the 0.5-MG planned temporary MWUP tank are both in operation.
[2] Assumes the new 5.0-MG tank at the Orangecrest site is constructed by 2030 per the 2020 FMP. The temporary 0.5-MG MWUP storage tank would be taken offline and relocated.

A-1.2 Cont.

Placement of the tanks within the existing Orangecrest site were also evaluated to confirm the temporary 0.5-MG tank could remain during construction of the proposed 5-MG recycled water tank anticipated to be constructed by 2030. **Figure 12** provides a conceptual siting evaluation for the proposed 0.5-MG temporary recycled water tank, the proposed 5-MG permanent recycled water tank as well as the proposed 5-MG potable water tank, which would be constructed after removal of the temporary 0.5-MG recycled water tank in the 2030 timeframe.

Figure 12. Ultimate Buildout with MWUP – MDD plus FF with Improvements



A-1.2
Cont.

3.2.2 Distribution System Analysis

The proposed recycled water lines for the project site were added to Western's most recent recycled water model. The project site's MDD of 281.5 gpm was split evenly between the nine (9) nodes in the proposed MWUP system. The previous water demand of 114.5 gpm and proposed pipelines for the soccer fields were removed from the hydraulic model. A 48-hour extended period simulation (EPS) was run in the model for MDD for the Existing (2020), Near-Term (2030) and Ultimate Buildout scenarios and results compared to District evaluation criteria, including a minimum service pressure of 40 psi during MDD, minimum residual pressure of 20 psi during fire flow, and a maximum pipeline velocity of 7.5 fps during any condition.

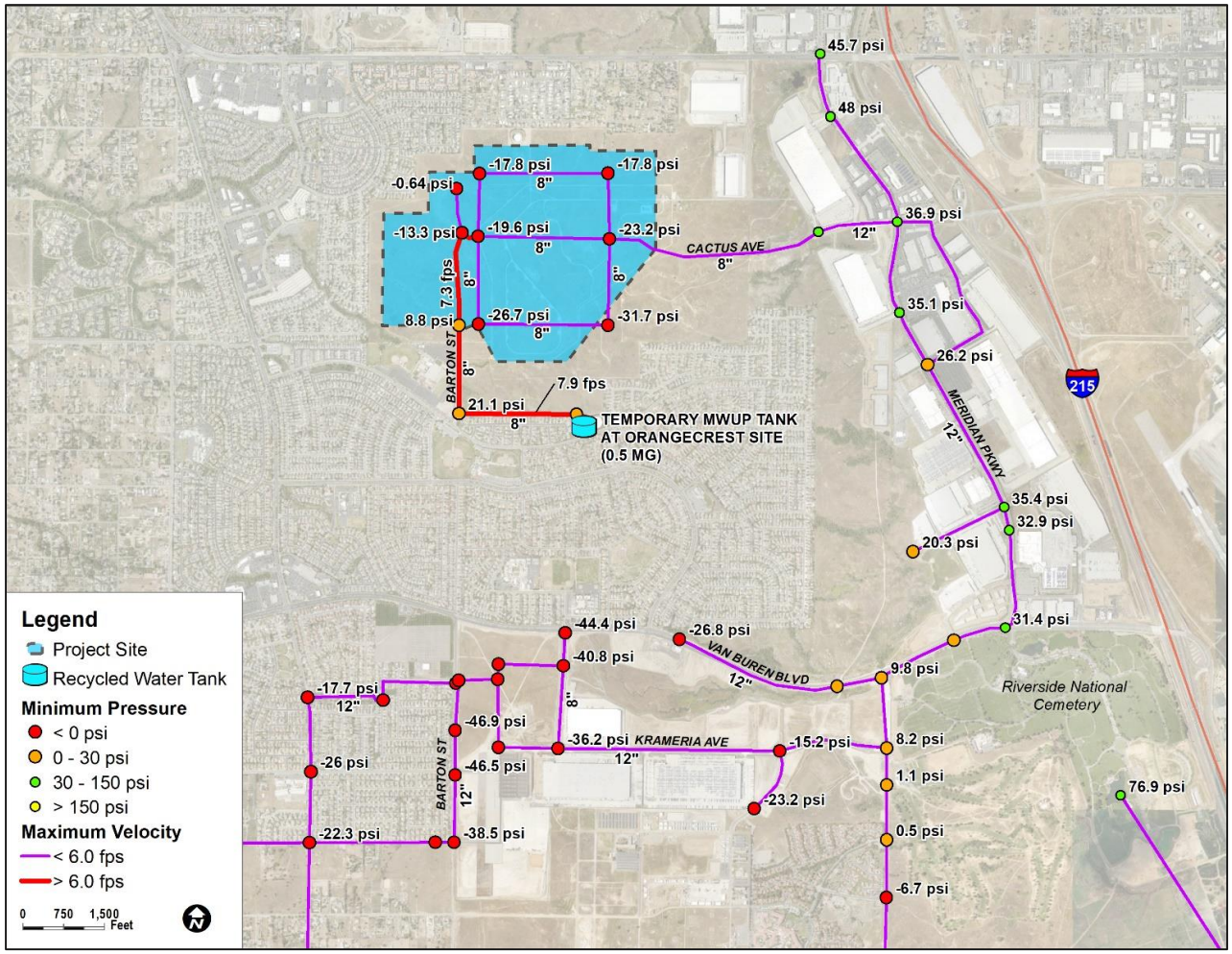
The following subsections provide the results of each scenario.

A-1.2 Cont.

3.2.2.1 Existing MDD

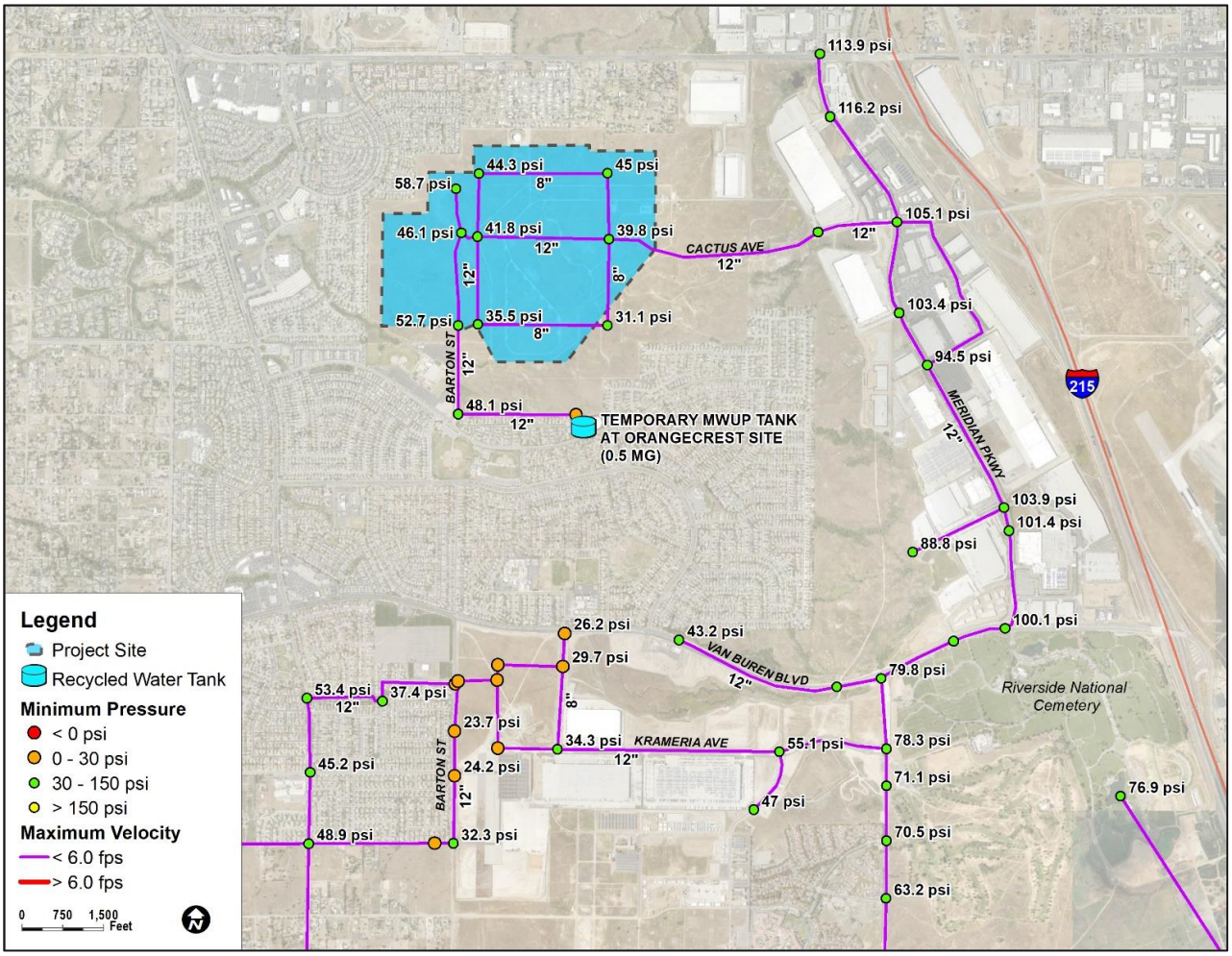
Analysis of the originally-proposed single 8-inch service line in Cactus to the temporary 0.5-MG tank determined that the proposed infrastructure does not provide sufficient capacity for flows from the temporary in the event that the Oleander booster pump station is not pumping when the large RNC demand hits the 1815 zone, as shown in **Figure 13**. Maximum pipeline velocities are anticipated to exceed District criteria and minimum pressures could drop below zero psi. However, analysis indicates that upsizing the main supply line from 8-inch to 12-inch from the tie-in on Cactus Ave to the temporary tank is anticipated to provide sufficient capacity to utilize storage volumes at the temporary tank in the event Oleander PS is not pumping when demands significantly increase in the zone. These results are shown graphically in **Figure 14**. Therefore, it is recommended that the supply line be upsized to 12-inch diameter from Cactus to the temporary 0.5-MG tank.

Figure 13. Recycled Water Existing MDD – 8" Service from Cactus Ave



A-1.2 Cont.

Figure 14. Recycled Water Existing MDD – 12" Service from Cactus Ave

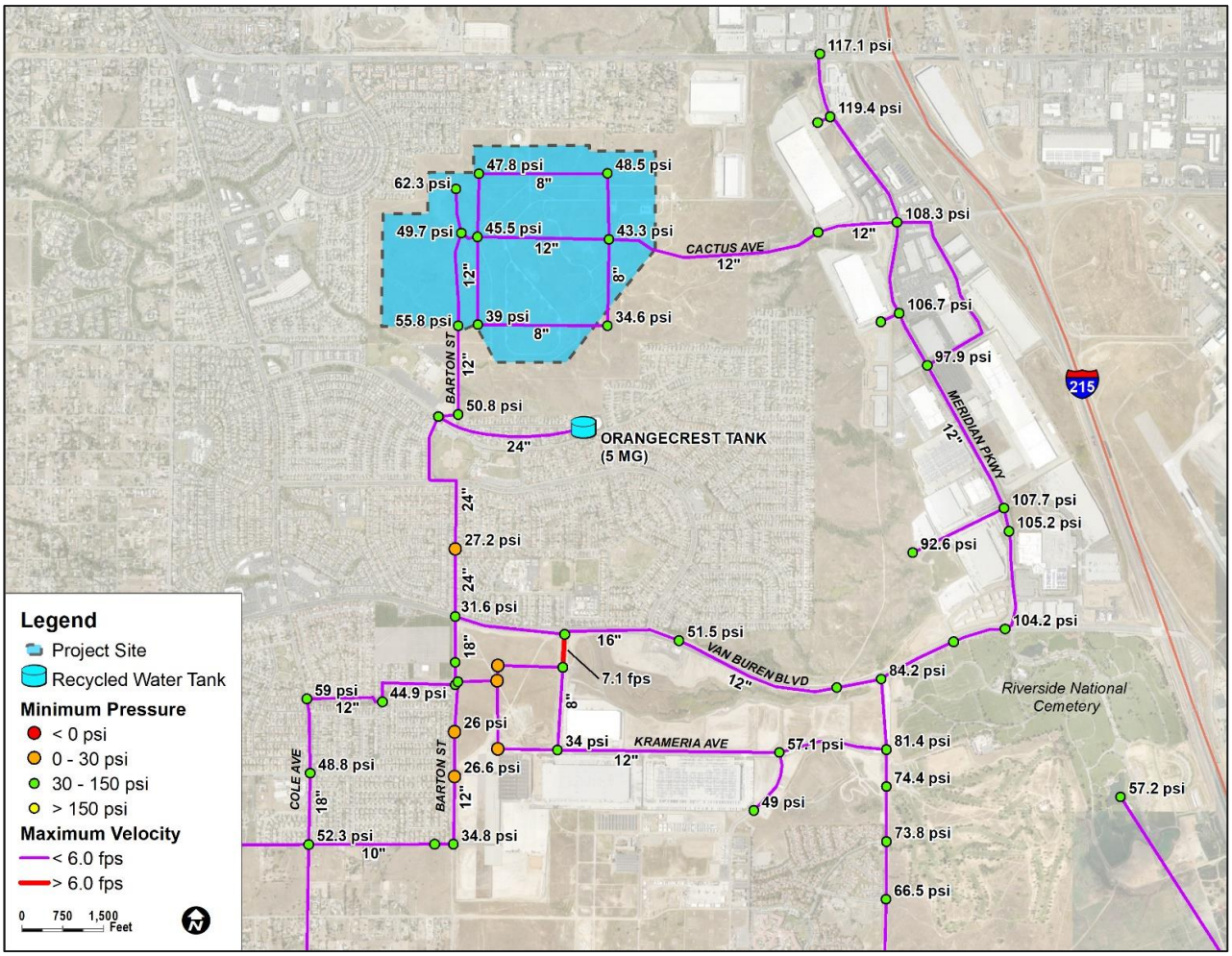


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3.2.2.2 Near-Term MDD

For the Near-Term MDD analysis with looped supply to the MWUP development with the 12-inch supply line in Cactus and Barton to the tank from the north, the results indicate minimum pressures in the development being maintained above 30 psi, as shown in **Figure 15**. One short (610 LF) portion of existing 8-inch in Coyote Bush Road just south of Van Buren Blvd reaches a maximum velocity of 7.4 fps, which exceeds the District maximum velocity criteria of 6 fps. No other new low pressure areas or high velocity pipelines were identified.

Figure 15. Recycled Water Near-Term MDD – Looped Service from Cactus Ave & Barton Dr



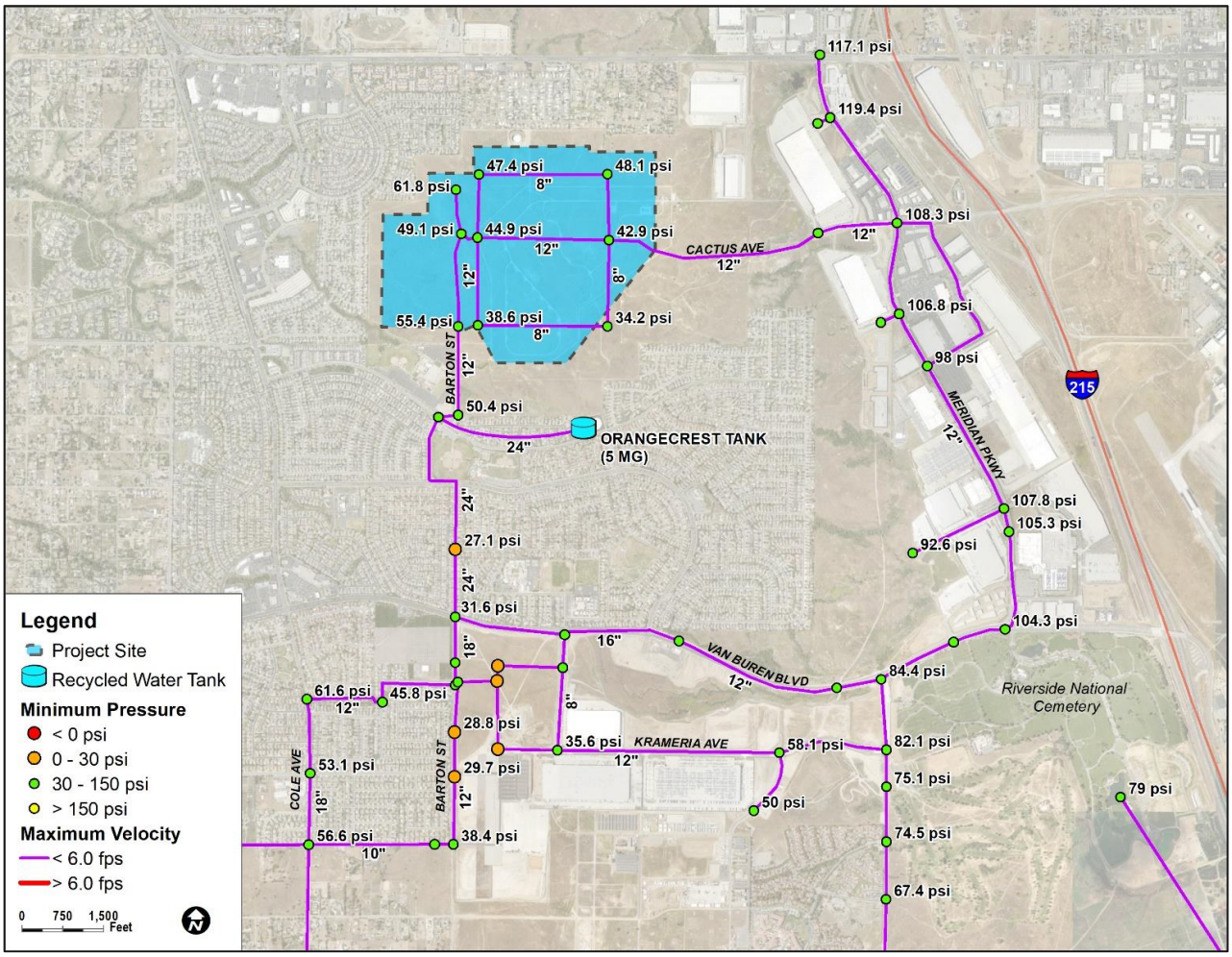
Note that modeling indicates that the infrastructure shown in Figure 15 with service to the new 5-MG Orangecrest tank via a 24-inch supply line in the south is required once demand levels in the zone, predominantly those of the Riverside National Cemetery, reach 2030 anticipated levels as the larger diameter pipeline is required to more efficiently move water in and out of the new 5-MG Orangecrest Reservoir.

A-1.2 Cont.

3.2.2.3 Ultimate Buildout MDD

For the Ultimate Buildout MDD analysis with looped supply to the MWUP development, the results indicate minimum pressures in the development being maintained, as shown in **Figure 16.** No pipelines were found to exceed the District maximum velocity criteria of 6 fps. System pressures int the remainder of the 1815 zone were consistent with the findings of the 2020 FMP.

Figure 16. Recycled Water Ultimate Buildout MDD – Looped Service from Cactus Ave & Barton Dr



A-1.2 Cont.

3.2.3 Recycled Water Pump Station Analysis

An updated pump station analysis was performed for the 1815 zone, which receives water from both the WWRF and Oleander pump stations. As shown in **Table 6**, the results of the analysis indicate that the 1815 zone is anticipated to have sufficient capacity to accommodate the MWUP through Buildout with no improvements required. Note that in the Ultimate demand scenario, supply from the Colorado River Aqueduct is anticipated to be required to satisfy the MDD of the zone.

Table 6. Recycled Water Pump Station Analysis for the 1815PZ

Scenario	Pressure Zone	Zone MDD (gpm)	Zone Total Pumping Capacity (gpm)[1]	Zone Firm Pumping Capacity (gpm)[2]	Surplus (gpm)
Existing (2020) + MWUP	1815	2,140	11,940	7,580	5,440
Near-Term (2030) + MWUP	1815	3,500	11,940	7,580	4,080
Ultimate + MWUP	1815	5,480[3]	11,940	7,580	2,100

Notes:
[1] Total capacity value shown is sum of all pumps at Oleander and WWRF pump stations, per Table 2-9 of the 2020 FMP.
[2] Firm pumping capacity assumes largest pump in each pump station is out of capacity. Values are some of firm pumping capacities of both Oleander and WWRF pump stations, per Table 2-9 of the 2020 FMP.
[3] Supply from the Colorado River Aqueduct (CRA) is anticipated to be required to satisfy the Ultimate demand in the zone. Maximum supply from the Riverside Canal was estimated at 11.1 CFS in the 2020 FMP and it was noted that, even prior to the Upper Plateau development, supply from the CRA would be required to satisfy the zone's demand needs.

A-1.2 Cont.

3.2.4 Recycled Water Analysis Summary

The results of the recycled water analysis indicate that a 0.5-MG temporary bolted steel tank is required for the development at the Orangecrest location to maximize pressures within the development. Due to the distance between the Lurin Tank and a new tank at the Orangecrest site, the initial onsite recycled water system will require a 12-inch supply line from the tie-in on Cactus Ave to the new 0.5-MG temporary tank. In the near-term (~2030) with the construction of the full 5-MG Reservoir and 24-inch supply line from the south, there still may be some portions of the development that have pressures below 30 psi, which will require irrigation pumps.

The following recycled water improvements are required to accommodate the immediate construction of the MWUP development:

- Construct temporary 0.5-MG bolted steel tank at Orangecrest Tank site.
- Increase the size of the main supply line from the Cactus tie-in to the temporary tank to 12-inches

The following are additional future (2030 and Buildout) recycled water system recommendations not previously included in the 2020 FMP necessary to accommodate the MWUP development:

- Irrigation pumps required anywhere pressures drop below 30 psi.
- Recycled water storage deficit for 1815 PZ in Ultimate Buildout scenario of 1.65-MG, an increase of 0.41-MG from 2020 FMP analysis due the MWUP development.

- It is important Western construct the southern supply to the new 5-MG tank prior to the RNC reaching its anticipated 2030 demands in order to efficiently distribute water from the tank into the zone.

3.3 Sewer Analysis

The MWUP project will discharge into the existing Meridian trunk sewer that flows directly into the WWRF from the north. Per the developer, the anticipated average dry weather flow (ADWF) for the project is 448,000 gallons per day (0.45 MGD) using the Industrial sewer generation factor of 2,000 gpd/acre from Table 3-21 of the 2020 FMP and 224 acres tributary to the Western Riverside sewer collection system (the remaining 30 acres being tributary to the City of Riverside system). Note that the sewer generation factor of 2,000 gpd/acre is likely conservative for the MWUP development given light industrial is anticipated to be the typical tenet type, where sewer generation is often significantly lower than the 2,000 gpd/acre value used herein. The updated sewer analysis includes peak wet weather flow (PWWF) scenarios evaluated for the Existing (2020), Near-Term (2030) and Buildout scenarios. Three analyses will be performed to update the sewer system results from the 2020 FMP, including a treatment analysis, a collection system analysis and a lift station analysis.

3.3.1 Treatment Analysis

An updated treatment analysis was developed for this Study. Treatment plant capacity is based on average dry weather flows (ADWF). **Table 7** presents the updated ADWF projections for the WWRF, which has a current treatment capacity of 3.0 MGD. The results indicate that the MWUP development is projected to result in the capacity of the WWRF to be exceeded in the Ultimate Buildout by 1.07 MGD based on current conservative estimates. The totals shown below include a 0.35 MGD diversion flow from City of Riverside. One partial mitigation option would be to end the agreement with City of Riverside as flows at WWRF approach capacity to extend the life of the existing 3.0 MGD WWRF capacity.

A-1.2 Cont.

Table 7. Average Daily Flows at WWRF

Scenario	WWRF Influent Flow Rate (MGD)	Surplus/(Deficit) Capacity (MGD)
Existing (2020)[1]	1.15	1.85
Existing (2020) + MWUP	1.60	1.40
Near-Term (2030) [1]	2.32	0.68
Near-Term (2030) + MWUP	2.77	0.23
Ultimate[1]	3.62	(0.62)
Ultimate + MWUP	4.07	(1.07)
Ultimate + MWUP without 0.35 MGD Riverside Diversion	3.72	(0.72)

Notes:
[1] Data from Table 3-24 of the 2020 FMP; includes 0.35 MGD scalped flow from City of Riverside.

3.3.2 Collection System Analysis

For the 2020 PWWF scenario for the 2020 FMP, a singular wet weather diurnal flow pattern was developed for the unmetered areas tributary to the WWRF for model calibration. As a part of this study, Dudek upgraded the hydraulic model by creating a new wet weather diurnal pattern to improve calibration at WWRF. A revised diurnal pattern with a peak of 2.6 resulted in modeled flows at WWRF being within 2% of measured average flows and within 6% of measured peak flows, an improvement from the calibration results in the 2020 FMP. This refined diurnal pattern was utilized for the unmonitored areas tributary to the Meridian trunk sewer for the PWWF scenarios for Existing (2020), Near-Term (2030) and Ultimate Buildout in the collection system analysis.

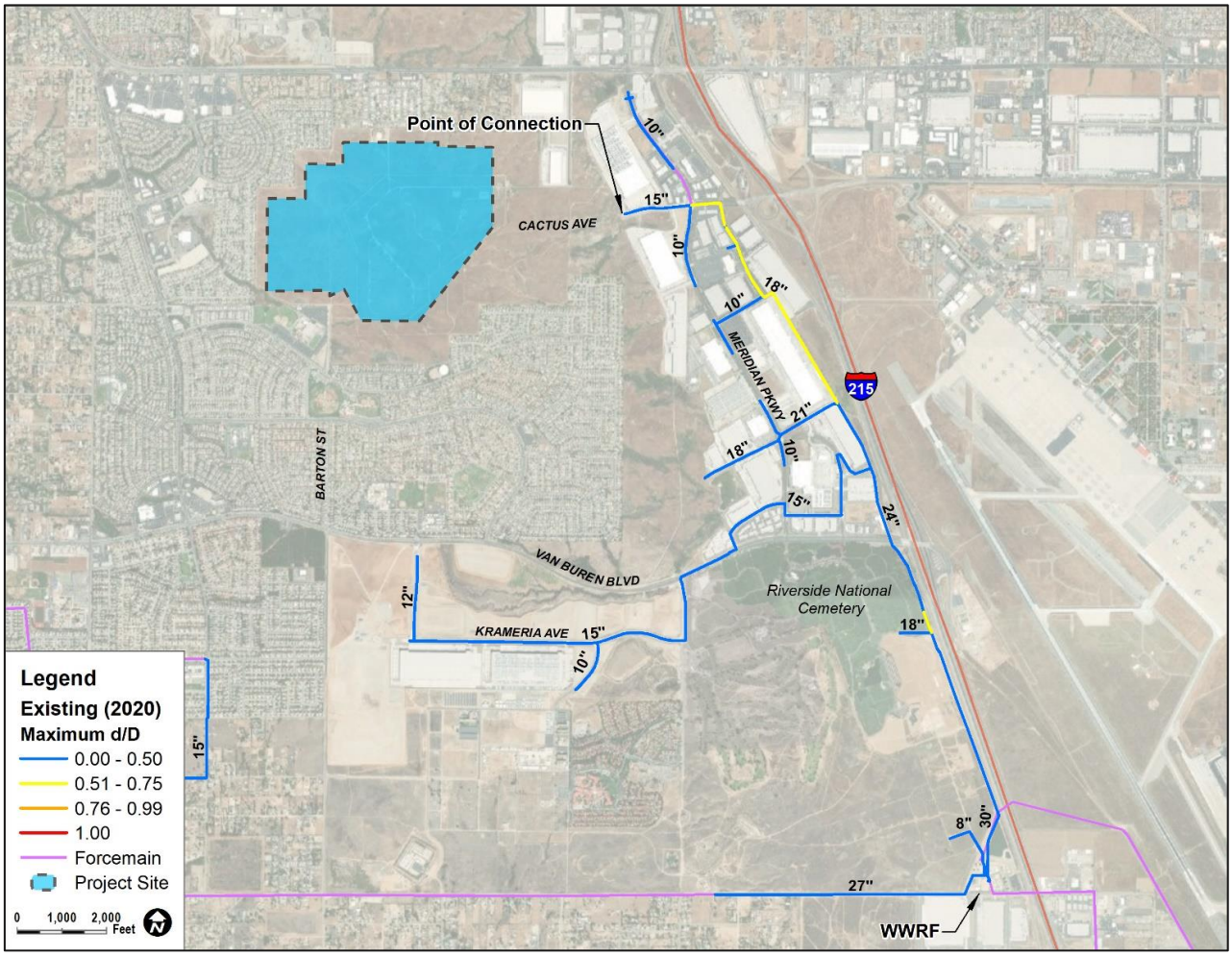
The average load of 311.1 gpm (448,000 gpd) provided by the developer was loaded onto the existing sewer model at manhole junction ID T36042100, which discharges into the existing 15-inch pipeline on Cactus Avenue prior to conveyance via the Meridian Trunk sewer for discharge into the WWRF. A 24-hour EPS was run for the Existing (2020), Near-Term (2030) and Ultimate Buildout scenarios in the hydraulic model. Maximum depth over diameter (d/D) ratio results from the model were compared against the Western maximum d/D criteria of 0.75 for pipelines 15-inches in diameter and greater to evaluate if the addition of the MWUP sewer loading is anticipated to result in sewerline capacity deficiencies.

A-1.2 Cont.

3.3.2.1 Existing (2020) PWWF Analysis

Results of the Existing PWWF scenario with the addition of the MWUP load at the north end of the Meridian trunk sewer results in no new sewerline deficiencies (maximum d/D less than 0.75). The results are shown graphically in **Figure 17**.

Figure 17. Sewer Existing (2020) PWWF Results – Maximum d/D

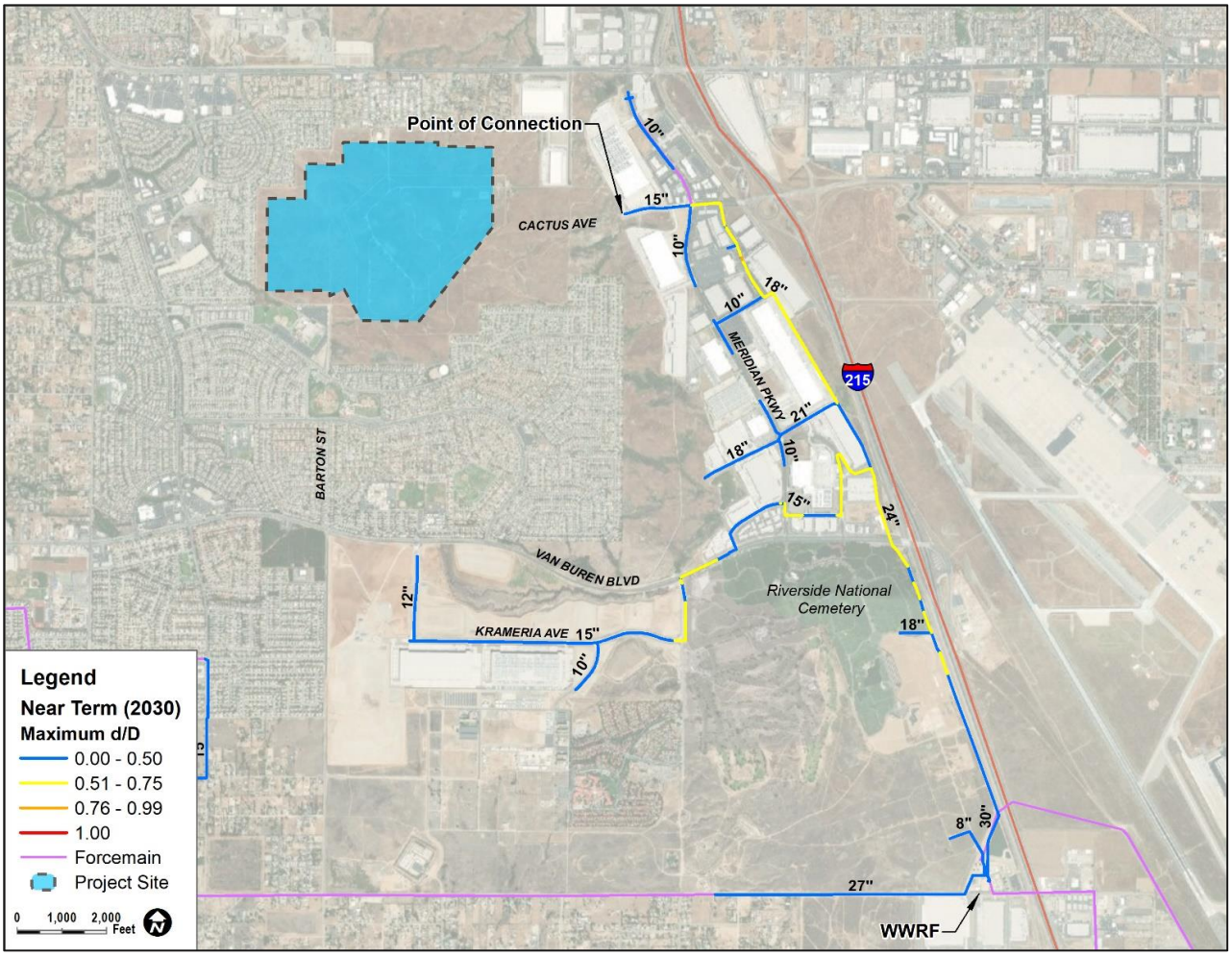


A-1.2 Cont.

3.3.2.2 Near-Term (2030) PWWF Analysis

Results of the Near-Term PWWF scenario with the addition of the MWUP load at the north end of the Meridian trunk sewer results in no new sewerline deficiencies (maximum d/D less than 0.75). The results are shown graphically in **Figure 18**.

Figure 18. Sewer Near-Term (2030) PWWF Results – Maximum d/D

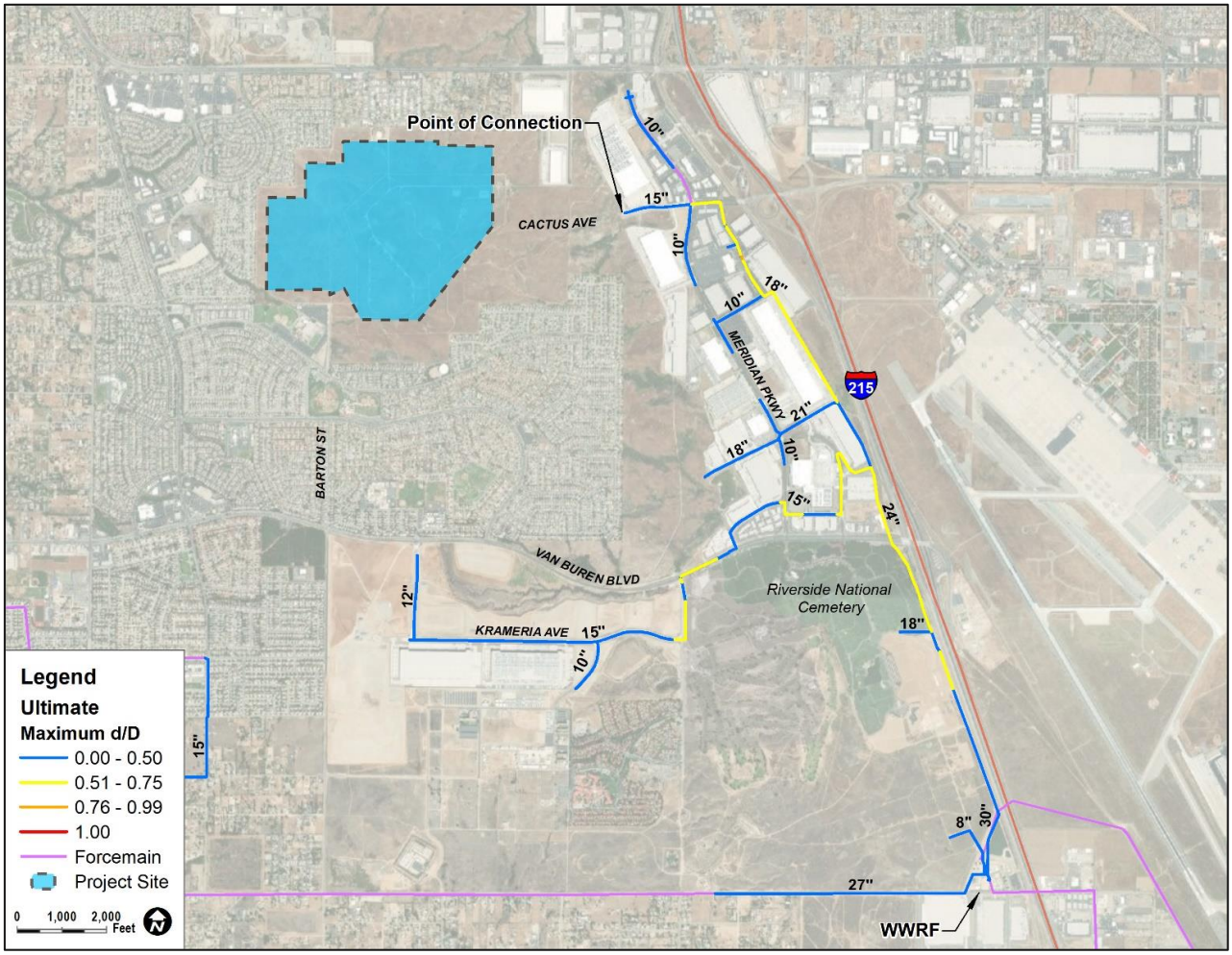


A-1.2 Cont.

3.3.2.3 Ultimate Buildout PWWF Analysis

Results of the Ultimate Buildout PWWF scenario with the addition of the MWUP load at the north end of the Meridian trunk sewer results in no new sewerline deficiencies (maximum d/D less than 0.75). The results are shown graphically in **Figure 19**.

Figure 19. Sewer Ultimate Buildout PWWF Results – Maximum d/D



A-1.2 Cont.

3.3.3 Lift Station Analysis

The sewer flow from the MWUP will not intercept any lift stations; therefore, a lift station analysis was not performed for this study.

3.3.4 Sewer Analysis Summary

The sewer analysis found that the addition of the MWUP sewer load is anticipated to result in an ultimate treatment capacity deficiency at WWRF of 1.07 MGD with the City of Riverside diversion into the Western system and 0.72 MGD without the City of Riverside diversion. No collection system deficiencies are anticipated with the development of the MWUP project assuming discharge into the existing 15-inch sewerline in Cactus Ave. Per the developer, the first flows from the development are anticipated in the next 3 to 4 years, with buildout anticipated within the next 10 years, depending on market conditions.

4 Findings & Recommendations

The following summarizes the findings and recommendations from this analysis. Note the findings for each system are broken into those improvements required to accommodate the immediate construction of the MWUP development and those required for future (2030 and Build out time frames) accommodation of the development.

A-1.2 Cont.

<u>Immediate System Improvement Requirements:</u>

- Potable Water System:
    a. Upsize 1,300 LF of 12-inch on Deercreek Drive from Grove Community Drive to Orange Terrace Parkway to 16-inch (Note: if space is available for the parallel 12-inch pipeline proposed by the developer, the recommendation for this upsizing changes to the following: Upsize 350 LF of 8-inch on Grove Community Drive to Deercreek Drive to 12-inch [assumes sufficient space exists to construct parallel 12-inch on Deercreek and Grove Community Drive]).
    b. Upsize 700 LF of 12-inch on Barton St north of Van Buren to 20-inch.
- Recycled Water System:
    a. Construct temporary 0.5-MG bolted steel tank at Orangecrest Tank site.
    b. Upsize the main supply line from the Cactus Avenue tie-in to the temporary tank to 12-inch diameter.
- Sewer System: None

<u>Future System Improvements and Recommendations:</u>

- Potable Water
    a. Upsize 600 LF of existing 18-inch on Van Buren Blvd east of Tautwein Rd to 20-inch (scenarios 2030 and Buildout only).

b. Potable water storage deficit in 1900 PZ in Ultimate Buildout of 2.08 MG, an increased deficit of 1.45-MG from 2020 FMP analysis. Recommend either contribution to the construction of 2.1-MG of additional storage (1.45-MG attributable to MWUP) or an alternative method of reducing the equalization storage requirement for the zone, such as a reservoir management system (RMS) with a Tesla battery to accommodate the increased high-TOU pumping required to maintain reservoir levels during peak daytime demand hours.

- Recycled Water System:

  a. Irrigation pumps are required anywhere pressures drop below 30 psi, potentially in the southeast corner of property.

  b. Recycled water storage deficit for 1815 PZ in Ultimate Buildout scenario of 1.65-MG, an increase of 0.41-MG from 2020 FMP analysis due to MWUP development. Recommend contribution of 0.41-MG of buildout storage once buildout storage needs are determined and required.

- Sewer System:

  a. Ultimate Buildout sewage treatment anticipated deficit of 1.07-MGD at WWRF with the City of Riverside diversion into the Western system and 0.72-MGD without, which is an additional 0.1-MGD increased deficit due to the MWUP development. Recommend Western discuss removing 0.35 MGD City of Riverside diversion to WWRF as plant flows approach capacity to extend the life of the existing 3.0-MGD WWRF capacity. The additional ultimate buildout treatment deficit anticipated to result from MWUP and other future contributors is considered a long-term increase in treatment capacity needs that will be included in the future treatment capacity charges that will be equitably collected from all contributors to accommodate the increased treatment capacity needs at WWRF.

  b. No collection system pipeline improvements anticipated.

A-1.2 Cont.

Letter A-1

Western Municipal Water District
January 27, 2023

A-1.1 WMWD submitted revised conditions of approval dated April 13, 2023. The Project will be conditioned in accordance with the WMWD April 13th letter, attached as Appendix K-7 of this Final EIR.

A-1.2 WMWD attached a Final Technical Memorandum, dated January 18, 2023, discussing the Meridian Upper Plateau Water, Recycled Water, and Sewer Development Analysis. The information and recommendations included within this Technical Memorandum have been incorporated into Section 4.17, Utilities and Service Systems, in this Final EIR.

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AGUA CALIENTE BAND OF CAHUILLA INDIANS
TRIBAL HISTORIC PRESERVATION

05-009-2021-001

February 07, 2023

[VIA EMAIL TO:fairbanks@marchjpa.com]
March Joint Powers Authority (JPA)
Mr. Dan Fairbanks
14205 Meridian Parkway #140
Riverside, CA 92518

Re: West Upper Campus Plateau

Dear Mr. Dan Fairbanks,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the West March Upper Plateau project. We have reviewed the documents and have the following comments:

> *At this time ACBCI has no comments, but please continue to provide our office with updates as the project progresses. Also, please inform our office if there are changes to the scope of this project.

A-2.1

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 423-3485. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Xitlaly Madrigal
Cultural Resources Analyst
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

Letter A-2

Agua Caliente Band of Cahuilla Indians
February 7, 2023

A-2.1 Agua Caliente Band of Cahuilla Indians indicates that they do not have any comments at this time. No changes or revisions to the Draft EIR are required in response to this comment.

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Comment Letter A-3

From: Mauricio Alvarez <malvarez@riversidetransit.com>
Sent: Tuesday, February 14, 2023 8:09 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau

Good Morning Dan,

Thank you for including Riverside Transit Agency in the transmittal to review the West Campus Upper Plateau proposed project. After reviewing the draft EIR, there are no comments to submit for this particular project at this time. Per the plans, it looks like there will be sidewalk along the main roads, to include Brown Street and Barton Road. This will provide safe pathways for pedestrians to connect to public transportation on Alessandro Blvd. A-3.1

Thank you,

Mauricio Alvarez, MBA
Planning Analyst
Riverside Transit Agency
p: 951.565.5260 | e: malvarez@riversidetransit.com
Website | Facebook | Twitter | Instagram
1825 Third Street, Riverside, CA 92507

Letter A-3

Riverside Transportation Agency
February 14, 2023

A-3.1 Riverside Transit Agency (RTA) indicates that they do not have any comments at this time. RTA notes the inclusion of sidewalks along the Project's main roads and states these will provide safe pathways for pedestrians to connect to public transportation. No changes or revisions to the Draft EIR are required in response to this comment.

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Community Development Department
Planning Division
14177 Frederick Street
P. O. Box 88005
Moreno Valley CA 92552-0805
Telephone: 951.413-3206
FAX: 951.413-3210

March 2, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway
Riverside, CA 92518

Subject: Comments on Notice of Availability of Draft EIR – West Campus Upper Plateau

Dear Mr. Fairbanks:

The City of Moreno Valley appreciates the opportunity to comment on the Notice of Availability of the Draft Environmental Impact Report for the West Campus Upper Plateau project. The proposed project is in close proximity to the City of Moreno Valley, and therefore, the City has a keen interest in them to ensure it is successful without causing adverse impacts to the City of Moreno Valley.

A-4.1

On December 17, 2021, March 25, 2022, May 17, 2022, and July 5, 2022, the City of Moreno Valley has provided comments regarding the proposed project and at the time the forthcoming Environmental Impact Report.

In response to your Notice of Availability, the City would offer the following comments:

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

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

A-4.2

The City of Moreno Valley looks forward to working with the March Joint Powers Authority team as this project proceeds through the public hearing processes. Please include the City on the mailing list for future notification of meetings and public hearings associated with this project.

A-4.3

Thank you again for the opportunity to provide comments on this project. Should you have any questions or concerns, please contact me at (951) 413-3215 or seanke@moval.org.

Sincerely,

Sean P. Kelleher
Planning Division Manager / Planning Official

cc: Mike Lee, City Manager
Michael Lloyd, Assistant City Manager
Manuel Mancha, Community Development Director
Melissa Walker, Public Works Director / City Engineer
Michele Patterson, Economic Development Manager

Attachments:
1. July 5, 2022, Comment Letter

Attachment 1

July 5, 2022, Comment Letter

Community Development Department
Planning Division
14177 Frederick Street
P. O. Box 88005
Moreno Valley CA 92552-0805
Telephone: 951.413-3206
FAX: 951.413-3210

July 5, 2022

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway
Riverside, CA 92518

Subject: Comments on Two Plot Plans within the West Campus Upper Plateau Project

Dear Mr. Fairbanks:

The City of Moreno Valley appreciates the opportunity to comment on the Two Plot Plans at 20133 and 20600 Cactus Avenue within the West Campus Upper Plateau Project. The proposed projects are in close proximity to the City of Moreno Valley, and therefore, the City has a keen interest in them to ensure they are successful without causing adverse impacts to the City of Moreno Valley. A-4.4

On December 17, 2021, March 25, 2022, and May 17, 2022, the City of Moreno Valley provided the attached letters commenting on the greater West Campus Upper Plateau Project. We would again ask to be involved in the review of the Traffic Study Scoping Agreement and the review of the Traffic Study during the preparation of the document. Furthermore, the Environmental Impact Report needs to address all direct and cumulative impacts that may affect the City of Moreno Valley, including impacts to Police and Fire Protection services. A-4.5 A-4.6

In addition to the comments previously provided for the greater West Campus Upper Plateau Project, the comments identified in the MJPA West Campus Upper Plateau Traffic and VMT Analysis; Transportation Engineering Division 2nd Review Comments Memorandum, attached herein, need to be addressed. A-4.7

The City of Moreno Valley looks forward to working with the March Joint Powers Authority team as these projects progress through the environmental review and public hearing processes. Please include the City on the mailing list regarding all EIR documents and for future notification of meetings and public hearings associated with these projects. A-4.8

Thank you again for the opportunity to provide comments on these projects. We look forward to working with you as these Projects are being finalized and reviewing all

environmental documents when complete. Should you have any questions or concerns, please contact me at (951) 413-3215 or seanke@moval.org.

A-4.8 Cont.

Sincerely,

Sean P. Kelleher
Planning Division Manager / Planning Official

cc: Mike Lee, City Manager
Aldo Schindler, Assistant City Manager
Manuel Mancha, Community Development Director
Michael Lloyd, Public Works Director I City Engineer
Melissa Walker, Engineering Division Manager/ Assistant City Engineer
Wei Sun, Principal Engineer/ City Traffic Engineer
Michele Patterson, Economic Development Manager

Attachments:
1. May 17, 2022, Comment Letter
2. MJPA West Campus Upper Plateau Traffic and VMT Analysis; Transportation Engineering Division 2nd Review Comments Memorandum

Attachment 1

May 17, 2022, Comment Letter

Community Development Department
Planning Division
14177 Frederick Street
P. O. Box 88005
Moreno Valley CA 92552-0805
Telephone: 951.413-3206
FAX: 951.413-3210

May 17, 2022

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway
Riverside, CA 92518

Subject: Comments on Two Plot Plans within the West Campus Upper Plateau Project

Dear Mr. Fairbanks:

The City of Moreno Valley appreciates the opportunity to comment on the Two Plot Plans at 20133 and 20600 Cactus Avenue within the West Campus Upper Plateau Project. The proposed projects are in close proximity to the City of Moreno Valley, and therefore, the City has a keen interest in them to ensure they are successful without causing adverse impacts to the City of Moreno Valley. A-4.9

On March 25, 2022, the City of Moreno Valley provided the attached letter commenting on the greater West Campus Upper Plateau Project. We would again ask to be involved in the review of the Traffic Study Scoping Agreement and the review of the Traffic Study during the preparation of the document. Furthermore, the Environmental Impact Report needs to address all direct and cumulative impacts that may affect the City of Moreno Valley, including impacts to Police and Fire Protection services. A-4.10 A-4.11

In addition to the comments previously provided for the greater West Campus Upper Plateau Project, the comments identified in the MJPA West Campus Upper Plateau Traffic and VMT Analysis; Transportation Engineering Division 1st Review Comments Memorandum, attached herein, need to be addressed. A-4.12

The City of Moreno Valley looks forward to working with the March Joint Powers Authority team as these projects progress through the environmental review and public hearing processes. Please include the City on the mailing list regarding all EIR documents and for future notification of meetings and public hearings associated with these projects. A-4.13

Thank you again for the opportunity to provide comments on these projects. We look forward to working with you as these Projects are being finalized and reviewing all

environmental documents when complete. Should you have any questions or concerns, please contact me at (951) 413-3215 or seanke@moval.org.

A-4.13 Cont.

Sincerely,

Sean P. Kelleher
Planning Division Manager / Planning Official

cc: Mike Lee, City Manager
Aldo Schindler, Assistant City Manager
Manuel Mancha, Community Development Director
Michael Lloyd, Public Works Director I City Engineer
Melissa Walker, Engineering Division Manager/ Assistant City Engineer
Wei Sun, Principal Engineer/ City Traffic Engineer
Michele Patterson, Economic Development Manager

Attachments:
1. March 25, 2022, Comment Letter
2. MJPA West Campus Upper Plateau Traffic and VMT Analysis; Transportation Engineering Division 1st Review Comments Memorandum

Community Development Department
Planning Division
14177 Frederick Street
P. O. Box 88005
Moreno Valley CA 92552-0805
Telephone: 951.413-3206
FAX: 951.413-3210

March 25, 2022

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway
Riverside, CA 92518

Subject: Comments on West Campus Upper Plateau Project

Dear Mr. Fairbanks:

The City of Moreno Valley again appreciates the opportunity to comment on the West Campus Upper Plateau Project. The proposed project is in close proximity to the City of Moreno Valley and therefore, the City has a keen interest in the project to ensure it is successful without causing adverse impacts to the City of Moreno Valley. A-4.14

On December 17, 2021, the City of Moreno Valley provided the attached letter commenting on the Notice of Preparation for this project. We would again ask to be involved in the review of the Traffic Study Scoping Agreement as well as the review of the Traffic Study during the preparation of the document. Furthermore, the Environmental Impact Report needs to address all direct and cumulative impacts that may affect the City of Moreno Valley. A-4.15 A-4.16

In addition to the comments previously provided the project needs to address the following comments.

1. The projects and specific plan identify an extension of Cactus on the west side of the I-215. They proposed Class II bike lanes that lead to the Cactus and I-215 interchange. The City of Moreno Valley's Bicycle Master Plan identifies Class II bike lanes that do not extend to that interchange but instead route to Old 215 Frontage Road. The specific plan should clarify where the bike lanes will connect to. A-4.17
2. Figure 5-1 and street section for Cactus, east of Linebacker seems to not provide a TWLTL. This is ok; however, revise legend for modified secondary highway (76'/98') to state that corridor does not include a TWLTL. A-4.18
3. A Technical Analysis needs to be prepared identifying the impacts of the proposed project on Police and Fire Protection services. A-4.19

The City of Moreno Valley looks forward to working with the March Joint Powers Authority team as this project progresses through the environmental review process and prior to A-4.20

the public hearing. Please include the City on the mailing list regarding all EIR documents as well as for future notification of meetings and public hearings associated with the project.

A-4.20 Cont.

Thank you again for the opportunity to provide comments on this project. We look forward to working with you as the Project is being finalized and reviewing all environmental documents when complete. Should you have any questions or concerns, please contact me at (951) 413-3215 or seanke@moval.org.

Sincerely,

Sean P. Kelleher
Planning Division Manager / Planning Official

cc: Mike Lee, City Manager
Manuel Mancha, Community Development Director
Michael Lloyd, Public Works Director I City Engineer
Melissa Walker, Engineering Division Manager/ Assistant City Engineer
Wei Sun, Principal Engineer/ City Traffic Engineer
Michele Patterson, Economic Development Manager

Attachments:
1. December 17, 2021 Comment Letter

Community Development Department
Planning Division
14177 Frederick Street
P. O. Box 88005
Moreno Valley CA 92552-0805
Telephone: 951.413-3206
FAX: 951.413-3210

December 17, 2021

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway
Riverside, CA 92518

Subject: Comments on Notice of Preparation for a Draft Environmental Impact Report (DEIR) and Initial Study (IS) for the Meridian West Upper Plateau Project

Dear Mr. Fairbanks:

The City of Moreno Valley appreciates the opportunity to comment on the Notice of Preparation for a Draft Environmental Impact Report for the proposed Meridian West Upper Plateau Project. The notice describes the proposal as General Plan, Zoning, and Specific Plan Amendments with Tentative Tract Map and Plot Plan applications to construct an approximately 1,330,000-square-foot industrial building on 59.55 acres, a 550,000-square-foot industrial building on 27.58 acres, and a 10.00-acre park with two small parking lots for recreational users to access the larger open space area. The proposed project is in close proximity to the City of Moreno Valley and therefore, the City has a keen interest in the project to ensure it is successful without causing adverse impacts to the City of Moreno Valley. A-4.21

The Environmental Impact Report will need to address all direct and cumulative impacts that may affect the City of Moreno Valley. In reviewing the proposal with our Public Works Department, the City would like to be involved in the review of the Traffic Study Scoping Agreement as well as the review of the traffic study during the preparation of the document. There are potential levels of service deficiencies to Moreno Valley streets, including but not limited to Cactus Avenue and Alessandro Boulevard from the project. A-4.22 A-4.23

The project description notes that a Draft Environmental Impact Report (DEIR) is forthcoming. The City of Moreno Valley looks forward to working with the March Joint Powers Authority team as this project progresses through the environmental review process and prior to the public hearing. Please include the City on the mailing list regarding all EIR documents as well as for future notification of meetings and public hearings associated with the project. A-4.24

Thank you again for the opportunity to provide comments on this project. We look forward to working with you as the DEIR is being finalized and reviewing all environmental documents when complete. Should you have any questions or concerns, please contact Chris Ormsby, AICP, Senior Planner at (951) 413-3229 or chriso@moval.org.

A-4.24
Cont.

Sincerely,

Sean P. Kelleher
Planning Official

cc. Mike Lee, City Manager
Ben Kim, Assistant City Manager
Manual Mancha, Community Development Director
Chris Ormsby, Senior Planner

MORENO VALLEY
WHERE DREAMS SOAR

CITY OF MORENO VALLEY
Public Works Department
Transportation Engineering Division

MEMORANDUM

To: Wei Sun, City Traffic Engineer

From: Lillyanna Diaz, Consultant Assistant Engineer

CC: Carolina Fernandez, HRG

Date: March 18, 2022

Subject: **MJPA West Campus Upper Plateau Traffic and VMT Analysis; Transportation Engineering Division 1st Review Comments**

The following findings and comments are based on the information provided on the West Campus Upper Plateau Traffic Analysis prepared by Urban Crossroads, dated March 9, 2022 and VMT Analysis prepared by Unban Crossroads, dated February 11, 2022.

The report analyzed roadway segments west of the I-215 Freeway analyzed the following scenarios:

- Existing (2021) traffic
- Existing (2021) traffic plus proposed project traffic
- Existing (2021) traffic plus ambient growth plus proposed project traffic
- Opening Year Cumulative (2025) without project
- Opening Year Cumulative (2025) with project
- Horizon Year (2045) without project
- Horizon Year (2045) with project

A-4.25

The following intersections were part of the study area intersections that are within or adjacent the City's boundary:

- Intersection #31: I-215 NB Ramps & Cactus Ave
- Intersection #34: Old 215 Frontage Rd & Alessandro Blvd
- Intersection #35: Day St & Alessandro Blvd
- Intersection #36: Elsworth St. & Cactus Ave
- Intersection #37: Frederick St & Cactus Ave
- Intersection #38: Graham St/Riverside Dr & Cactus Ave

The study identified that 12% of the passenger car trips and 3% of truck trips will travel into the City of Moreno Valley via Cactus and Alessandro Boulevard. Truck trips were included as a percentage of total traffic, not in passenger car equivalent (PCE).

The following summarized my comments related to the above referenced Traffic Impact Analysis (TIA) report and Vehicle Miles travelled (VMT) analysis:

Section 1: Summary of Findings

1. Revise amount and reference table from TUMF nexus study where the total cost of the I-215/Cactus interchange project is provided.
2. Queuing analysis was performed to identify any spill back onto the freeway main line from the off-ramps. No queueing analysis was performed for study area intersections located at Caltrans ramps. Per the approved scoping agreement, queuing analysis should be performed for all legs of ramp intersections.

A-4.26

Section 3: Area Conditions

3. Revise Exhibit 3-1 per the following:
   a. The speed on Cactus Avenue between Elsworth and the I-215 Ramps is 50 mph.
   b. Intersection #37 was recently improved as part of MJPA K4 Parcel to provide the following geometrics:
      - Northbound: One left turn lane and one shared through/right turn lane
      - Southbound: Two left turn lanes and one shared through/right turn lane (not RTO)
      - Eastbound: One left turn lane, three through lanes and one shared through/right turn lane
      - Westbound: One left turn lane, three through lanes, and one right turn lane (RTO)
   c. Counts were taken in November 2021 and improvements for Intersection #37 may have not been completed at that time. However, based on the Meridian K4 project's approved traffic study, trips should have been assigned at the south leg of that intersection and shown on Exhibit 4-5 at Intersection #37. Study can be provided by MJPA.

A-4.27

Section 5: E and E+P (2021) Conditions

4. Under E+P conditions, the project increases AM peak hour delay by 5.6 seconds (LOS F) and decreases the LOS in the PM peak hour from E to F (15 secs delay increase) at Intersection #36. See Table 5-1. The study recommends implementing a protected left turn phasing; however, the intersection cannot have a N/S protected left turns due to the dual left turns and insufficient space. This recommendation is not feasible, and study should recommend other improvements to address deficiency. This is applicable to all scenarios where said improvement is recommended.

A-4.28

Section 7: OYC and OYCP (2025) Conditions

5. See comment #4 for Intersection #36. Recommended improvement is not feasible.
6. Study recommends adding an EB through lane totaling to 4 through lanes at Intersection #36. This exceeds the number of through lanes identified in the City's General Plan and other improvements should be reviewed and recommended before an additional through lane is recommended. See Table

A-4.29

7-4.

Section 8: Horizon Year NP (2045) and Horizon Year WP (2045) Conditions

7. Under HYNP and HYWP conditions, Intersections #31, 34, 35, 36, 37, and 38 operate at an unacceptable LOS one or both peak hours. Project has cumulative impacts and increases delay by 5 seconds or more at Intersections #31, 34, 35, 36, and 38.

8. See comment #6 regarding adding a 4th EB through lane at Intersection #36. Comment is also applicable to recommended improvement at Intersection #31. Modification to the lane configuration is inconsistent with the City's General Plan.

Section 9: Local and Regional Funding Mechanisms

9. Revise Table 9-1 to highlight the highest fair share percentage. Remove or clarify the numbers after the intersection names in the table.

Appendices

10. Queuing should be provided in the analysis worksheets. Although it is not specified in the scoping agreement, queuing analysis should be performed at all study area intersections.

VMT Analysis

11. The VMT analysis states that the project's retail land uses will decrease total VMT by 0.29% and have less than significant impact. It also states that its no-retail land uses were below the VMT per employee threshold by 5.30%, having a less than significant impact. I concur with this conclusion.

A-4.29 Cont.

A-4.30

A-4.31

A-4.32

A-4.33

Please let me know if you have any questions or comments regarding the above comments or need any additional information. Thank you.

Attachment 2

MJPA West Campus Upper Plateau Traffic and VMT Analysis; Transportation Engineering Division 2nd Review Comments Memorandum

MORENO VALLEY
WHERE DREAMS SOAR

CITY OF MORENO VALLEY
Public Works Department
Transportation Engineering Division

MEMORANDUM

To: Wei Sun, City Traffic Engineer

From: Monica Pangco, Consultant Assistant Engineer

CC: Carolina Fernandez, HRG

Date: July 1, 2022

Subject: **MJPA West Campus Upper Plateau Project; Transportation Engineering Division 2nd Review Comments**

The following comments are based on the information provided in the Building B Plot Plan (PP21-03), Building C Plot Plan (PP21-04), Tentative Parcel Map (TPM 38063), and Draft West Campus Upper Plateau Specific Plan (SP-9), dated June 2022.

Building B Plot Plan (PP21-03) and Building C Plot Plan (PP21-04)

1. Provide turning templates for all movements to and from Cactus Avenue, Line Backer Drive, Bunker Hill Drive, and project driveway entrances. Use the largest truck that will be used. Use a STAA design vehicle. Show curb radii.
2. Clarify how Emergency Vehicle Access (EVA) will be used (i.e. gate, access, etc.) and connection to Cactus Avenue.
3. Provide a narrative on truck route throughout proposed Building B and Building C (i.e. access, hours of operation, etc.).
4. Proposed driveways shall be per Riverside County Standards.

A-4.34

Tentative Parcel Map (TPM 38063)

5. Provide City standards for proposed street sections.
6. Proposed street cross sections shall include slopes, dimensions (i.e. right-of-way, curb to curb).
7. Verify that the recommended lane configurations within the Traffic Impact Analysis (TIA) for this project are feasible on proposed street cross sections.
8. Provide a cross section for Emergency Vehicle Access (EVA) from Barton Street to Cactus Avenue.
9. Will there be proposed access provided from Authority Way to proposed adjacent "Open Space" Area?
10. Provide a list of all existing and proposed easements.
11. Clearly identify all existing and proposed right-of-way widths for adjacent streets on plans and cross-sections.
12. Tentative Parcel Map is subject to change due to findings from the Traffic Impact Analysis Report.

A-4.35

Draft West Campus Upper Plateau Specific Plan (SP-9)

1. Comment stands from 1st Review.

A-4.36

   a. The projects and specific plan identify an extension of Cactus on the west side of the I-215. They proposed Class II bike lanes that lead to the Cactus and I-215 interchange. The City of Moreno Valley's Bicycle Master Plan identifies Class II bike lanes that do not extend to that interchange but instead route to Old 215 Frontage Road. The specific plan should clarify where the bike lanes will connect to.
2. Comment stands from 1st Review.
   a. Figure 5-1 and street section for Cactus, east of Linebacker seems to not provide a TWLTL. This is ok; however, revise legend for modified secondary highway (76'/98') to state that corridor does not include a TWLTL.
3. Section 4.4.1 (Page 4-5)
   a. Fences and walls shall provide adequate sight distance at intersections per Riverside County Standards.

A-4.36 Cont.

Please let me know if you have any questions or comments regarding the above comments or need any additional information.

Thank you.

Letter A-4

City of Moreno Valley
March 2, 2023

A-4.1 This comment is introductory in nature and does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. The City of Moreno Valley refers to its attached December 17, 2021 letter, which is addressed in Responses A-4.21 through A-4.24, below, March 25, 2022 letter, which is addressed in Responses A-4.14 through A-4.20, below, May 17, 2022 letter, which is addressed in Responses A-4.9 through A-4.13, below, and July 5, 2022 letter, which is addressed in Responses A-4.4 through A-4.8, below.

A-4.2 This comment requests street improvement plans include the segment of Cactus Avenue between the northbound I-215 onramp and the southbound I-215 onramp and that the Project be conditioned to perform a 2-inch grind overlay along this segment. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. The California Department of Transportation (Caltrans) recently completed (April 2023) the grind and overlay for Cactus Avenue, between the I-215 northbound and southbound ramps, inclusive of restriping the overpass. This work is no longer needed. No changes or revisions to the Draft EIR are required in response to this comment.

A-4.3 This comment requests notification of future meetings and public hearings associated with the Project. March JPA will include the City on all Project notifications. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR.

A-4.4 This comment from the City of Moreno Valley's July 5, 2022 letter is introductory in nature and does not raise concerns about the adequacy of the environmental analysis in the Draft EIR.

A-4.5 This comment from the City of Moreno Valley's July 5, 2022 letter requested involvement in the Project Traffic Study Scoping Agreement and Traffic Study. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. The City of Moreno Valley Traffic Engineering Department reviewed the Traffic Study and provided a memorandum summarizing their traffic and VMT comments on March 18, 2022. The City of Moreno Valley Traffic Engineering Department was sent an updated Traffic Impact Analysis including the Traffic Study Scoping Agreement, the Traffic Appendices, and the Vehicle Miles Traveled Analysis on 6/21/22, and provided a memorandum dated 7/1/22 identifying supplemental traffic comments. A Final Traffic Impact Analysis with the Traffic Scoping Agreement, the Traffic Appendices and the Vehicle Miles Traveled Analysis was sent to the City of Moreno Valley on 10/31/22 with a requested comment submittal date of 11/17/22. March JPA followed up with the City of Moreno Valley on 11/22/22 requesting that any traffic engineering comments be submitted as soon as possible. No comments were received from the City of Moreno Valley regarding the 10/31/22 Final Traffic Study, and review comments regarding this item were not attached to the 03/02/23 Moreno Valley letter.

A-4.6 This comment from the City of Moreno Valley's July 5, 2022 letter was submitted prior to the release of the Draft EIR and requested the EIR address all direct and cumulative impacts potentially affecting the City, including impacts to police and fire protection services. The Draft EIR addressed the Project's direct, indirect, and cumulative environmental impacts, including those that would affect the City of Moreno Valley. Section 4.13, Public Services, analyzed the Project's impacts to fire protection services

and concluded the increase in demand for fire protection services due to the Project would result in less than significant impacts as no new or expanded fire protection facilities would be required to service the Project and MM-FIRE-1 (Pre-Construction Requirements) would further reduce potential impacts. Additionally, as discussed in Topical Response 6 – Meridian Fire Station, the Project Development Agreement includes the construction of the Meridian Fire Station at the corner of Meridian Parkway and Opportunity Way. Section 4.13, Public Services, also analyzed the Project's impacts to police services and concluded the increase in demand for police protection services due to the Project would result in less than significant impacts as no new or expanded police facilities would be required to service the Project; therefore, no mitigation is required. Section 4.13, Public Services, further analyzed cumulative impacts to police and fire protection services and concluded the Project would not result in a cumulatively considerable contribution associated with the construction of new or expanded police or fire facilities, and no mitigation is required.

A-4.7 This comment from the City of Moreno Valley's July 5, 2022 letter does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. The comment refers to the City's attached MJPA West Campus Upper Plateau Traffic and VMT Analysis – Transportation Engineering Division 2nd Review Comments Memorandum, which is addressed in Responses A-4.34 through A-4.36, below.

A-4.8 This comment from the City of Moreno Valley's July 5, 2022 letter requested notification of future meetings and public hearings associated with the Project. March JPA will include the City on all Project notifications. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR.

A-4.9 This comment from the City of Moreno Valley's May 17, 2022 letter is introductory in nature and does not raise concerns about the adequacy of the environmental analysis in the Draft EIR.

A-4.10 This comment from the City of Moreno Valley's May 17, 2022 letter requested involvement in the Project Traffic Study Scoping Agreement and Traffic Study. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. See Response A-4.5, above, detailing the City of Moreno Valley's participation in the Traffic Study for the Project.

A-4.11 This comment from the City of Moreno Valley's May 17, 2022 letter was submitted prior to the release of the Draft EIR and requested the EIR address all direct and cumulative impacts potentially affecting the City, including impacts to police and fire protection services. See Response A-4.6, above, explaining the Draft EIR's analysis of impacts that may affect the City of Moreno Valley, including police and fire protection services.

A-4.12 This comment from the City of Moreno Valley's May 17, 2022 letter was submitted prior to the release of the Draft EIR. The comment refers to the City's attached MJPA West Campus Upper Plateau Traffic and VMT Analysis – Transportation Engineering Division 1st Review Comments Memorandum, which is addressed in Responses A-4.25 through A-4.33, below.

A-4.13 This comment from the City of Moreno Valley's May 17, 2022 letter requested notification of future meetings and public hearings associated with the Project. March JPA will include the City on all Project notifications. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR.

A-4.14 This comment from the City of Moreno Valley's March 25, 2022 letter is introductory in nature and does not raise concerns about the adequacy of the environmental analysis in the Draft EIR.

A-4.15 This comment from the City of Moreno Valley's March 25, 2022 letter requested involvement in the Project Traffic Study Scoping Agreement and Traffic Study. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. See Response A-4.5, above, detailing the City of Moreno Valley's participation in the Traffic Study for the Project.

A-4.16 This comment from the City of Moreno Valley's March 25, 2022 letter was submitted prior to the release of the Draft EIR and requested the EIR address all direct and cumulative impacts potentially affecting the City. The Draft EIR addressed the Project's direct and cumulative environmental impacts, including those that would affect the City of Moreno Valley.

A-4.17 This comment from the City of Moreno Valley's March 25, 2022 letter was submitted prior to the release of the Draft EIR and requested the proposed Specific Plan identify where Cactus Avenue extension bike lanes will connect to existing bike lanes. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. Figure 5.4, Non-Motorized Circulation Plan, of the Specific Plan shows the Project will construct Class II bicycle lanes on Cactus Avenue from Airman Drive to the existing western terminus of Cactus Avenue. These bicycle lanes will connect to existing Class II bicycle lanes on Cactus Avenue that extend from the existing cul-de-sac at the western terminus of Cactus Avenue to the I-215 interchange ramps. The Project does not propose the development of any additional bicycle lanes to the east of the existing terminus of Cactus Avenue.

A-4.18 This comment from the City of Moreno Valley's March 25, 2022 letter was submitted prior to the release of the Draft EIR and requested clarification regarding Cactus Avenue east of Linebacker Drive as a Modified Secondary Highway. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. In response to this comment, Figure 5-1 of the Specific Plan was revised to denote Cactus Avenue east of Linebacker Drive as a Modified Industrial Collector Street. The revisions to the Specific Plan in response to this comment do not modify any of the analysis or change any conclusions in the Draft EIR and do not add any new significant impacts.

A-4.19 This comment from the City of Moreno Valley's March 25, 2022 letter was submitted prior to the release of the Draft EIR and requested the preparation of a technical analysis for Project impacts to police and fire protection services. See Response A-4.6, above, explaining the Draft EIR's analysis of impacts on police and fire protection services.

A-4.20 This comment from the City of Moreno Valley's March 25, 2022 letter requested notification of future meetings and public hearings associated with the Project. March JPA will include the City on all Project notifications. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR.

A-4.21 This comment from the City of Moreno Valley's December 17, 2021 letter is introductory in nature and does not raise concerns about the adequacy of the environmental analysis in the Draft EIR.

A-4.22 This comment from the City of Moreno Valley's December 17, 2021 letter was submitted prior to the release of the Draft EIR and requested the EIR address all direct and cumulative impacts potentially affecting the City. The Draft EIR addressed the Project's direct and cumulative environmental impacts, including those that would affect the City of Moreno Valley.

A-4.23 This comment from the City of Moreno Valley's December 17, 2021 letter requested involvement in the Project Traffic Study Scoping Agreement and Traffic Study. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. See Response A-4.5, above, detailing the City of Moreno Valley's participation in the Traffic Study for the Project. The comment raised concerns about potential levels of services deficiencies to City streets. The Project Traffic Analysis (Appendix N-2) analyzed four intersections within the City of Moreno Valley, as requested by the City:

- Day Street and Alessandro Boulevard (#35)
- Elsworth Street and Cactus Avenue (#36)
- Frederick Street and Cactus Avenue (#37)
- Graham Street/Riverside Drive and Cactus Avenue (#38)

As Section 4.15, Transportation, explains, Table 1-4 of the Traffic Analysis determined a fair share calculation for the Project for any improvement measures for identified operational deficiencies. PDF-TRA-4 requires the Project to contribute $321,799 as its fair share toward those improvement measures, which includes $87,196 for the City of Moreno Valley. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

A-4.24 This comment from the City of Moreno Valley's December 17, 2021 letter requested notification of future meetings and public hearings associated with the Project. March JPA will include the City on all Project notifications. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR.

A-4.25 This comment from the City of Moreno Valley Transportation Engineering Division 1st Review Comments dated March 18, 2022 was submitted prior to the release of the Draft EIR and summarized the scenarios and the City as well as City-adjacent intersections analyzed in the Project Traffic Analysis (Appendix N-2). The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR.

A-4.26 This comment from the City of Moreno Valley Transportation Engineering Division 1st Review Comments dated March 18, 2022 was submitted prior to the release of the Draft EIR and requested revisions related to the TUMF nexus study and queuing analysis. Urban Crossroads, who prepared the Project Traffic Analysis (Appendix N-2), provided responses to the City of Moreno Valley on May 19, 2022, as follows:

1. The footnote in Table 1-4 has been updated to reflect the 2016 Transportation Uniform Mitigation Fee (TUMF) 2016 Nexus Update. The cost has also been updated per the 2016 total cost assumption for the I-215/Cactus interchange project.

2. Off-ramp queuing is only performed for the off-ramp storage lengths to show if the anticipated queue lengths are anticipated to spill back onto the freeways. Per the approved scoping agreement, a queuing analysis would be provided for off-ramp locations only, not the through movements at the off-ramp intersections. Since the traffic study already provides a queuing analysis for the off-ramps, no further analysis has been included in the traffic study.

Identified revisions were incorporated into the Project Traffic Analysis prior to the public comment period. In addition, as Section 4.15, Transportation, of the Draft EIR explains as part of Threshold TRA-3, a queuing analysis is not warranted for construction related worker or truck trips because the Project construction schedule is not definitive at this stage. MM-TRA-1 requires the applicant to develop and implement a construction traffic management plan to be approved by March JPA and will include measures to limit temporary queuing issues. A queuing analysis was conducted for operational activities associated with buildout of the Project. The queuing analysis was conducted for the I-215 off-ramps at the Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard interchanges. The Project's increase in queues as well as the Project's contribution to cumulative queues would not result in traffic spilling back onto I-215 or add two or more car lengths to the ramp queues in the peak hours that would extend into the freeway mainline per Caltrans criteria.

Table 4.15-7 of the Draft EIR states that the 95th percentile queue exceeds capacity, but the evaluation was the queuing that would occur after two cycles. Table 4.15-7 shows that five of the six off-ramps would exceed the storage length but only the queue length after two cycles is reported in the table consistent with Caltrans evaluation criteria.

A-4.27 This comment from the City of Moreno Valley Transportation Engineering Division 1st Review Comments dated March 18, 2022 was submitted prior to the release of the Draft EIR and requested revisions to Exhibit 3-1 of the Traffic Analysis. Urban Crossroads, who prepared the Project Traffic Analysis (Appendix N-2), provided responses to the City of Moreno Valley on May 19, 2022, as follows:

3a) Exhibit 3-1 has been updated to reflect the correct speed on Cactus Avenue

3b) The March Joint Power Authority (JPA) K4 project was recently completed after the time this traffic study was prepared. Traffic counts for the proposed Project were conducted before the completion of the K4 project. As such, the K4 project has not been included for existing conditions. However, the K4 project is included as a cumulative development project (MJPA2 in Table 4-4). Therefore, the traffic volumes of the K4 project have been considered and included for the Opening Year and Horizon Year traffic forecasts. No changes to the traffic study have been made.

3c) See Response #3b.

Identified revisions were incorporated into the Project Traffic Analysis prior to the public comment period.

A-4.28 This comment from the City of Moreno Valley Transportation Engineering Division 1st Review Comments dated March 18, 2022 was submitted prior to the release of the Draft EIR and raised concerns regarding proposed improvements to Intersection #36. Urban Crossroads, who prepared the Project Traffic Analysis (Appendix N-2), provided responses to the City of Moreno Valley on May 19, 2022, as follows:

4. The identified intersection improvements at Elsworth Street and Cactus Avenue (#36) have been updated to include restriping of the northbound and southbound approaches so there are no shared left-through lanes. The traffic signal modification has been updated to include implementation of lead-lag operations for the northbound and southbound approaches to prevent conflicting left turns. All applicable scenarios have been updated.

Identified revisions were incorporated into the Project Traffic Analysis prior to the public comment period.

A-4.29 This comment from the City of Moreno Valley Transportation Engineering Division 1st Review Comments dated March 18, 2022 was submitted prior to the release of the Draft EIR and raised concerns regarding proposed improvements to Intersection #36. Urban Crossroads, who prepared the Project Traffic Analysis (Appendix N-2), provided responses to the City of Moreno Valley on May 19, 2022, as follows:

5. See Response #4, the intersection improvements have been updated.
6. Other physical improvements to the intersection of Elsworth Street and Cactus Avenue (#36) are not feasible for the following reasons:
   - There is not sufficient room to accommodate a 2nd eastbound left turn lane.
   - The northeast and northwest corners are built out; there is not sufficient right-of-way to accommodate additional lanes.
   - There is not sufficient room to accommodate a 2nd westbound left turn lane and there is not an additional receiving lane.

The recommendation to provide a 4th eastbound and westbound through lane is consistent with other recent traffic studies conducted in the area and there are no other feasible physical intersection improvements.

Although other physical improvements to the intersection are not feasible to improve the level of service, traffic delays that worsen levels of service are no longer considered a significant environmental impact under CEQA. Identified revisions were incorporated into the Project Traffic Analysis prior to the public comment period.

A-4.30 This comment from the City of Moreno Valley Transportation Engineering Division 1st Review Comments dated March 18, 2022 was submitted prior to the release of the Draft EIR and raised concerns regarding proposed improvements to Intersections #31 and #36. Urban Crossroads, who prepared the Project Traffic Analysis (Appendix N-2), provided responses to the City of Moreno Valley on May 19, 2022, as follows:

7. Comment noted. As shown in Table 8-4, intersection improvements have been provided for intersections #31, 34, 35, 36, and 38. As such, no changes are necessary to Table 8-4.
8. See Response #6. There are no other feasible physical roadway improvements to intersection #31.

As shown in Table 8-4 of the Project Traffic Analysis, with the improvements recommended for intersections #31, 34, 35, and 36, these intersections would operate at an acceptable LOS. Even with

feasible improvements, intersection #38 would still operate at LOS F. LOS delay is no longer an environmental impact under CEQA.

A-4.31 This comment from the City of Moreno Valley Transportation Engineering Division 1st Review Comments dated March 18, 2022 was submitted prior to the release of the Draft EIR and requested revisions to the fair share percentages. Urban Crossroads, who prepared the Project Traffic Analysis (Appendix N-2), provided responses to the City of Moreno Valley on May 19, 2022, as follows:

9. Table 9-1 has been updated to highlight the highest fair share percentage per intersection. The numbers after the intersection names have been removed.

Identified revisions were incorporated into the Project Traffic Analysis prior to the public comment period.

A-4.32 This comment from the City of Moreno Valley Transportation Engineering Division 1st Review Comments dated March 18, 2022 was submitted prior to the release of the Draft EIR and requested queuing be provided in the analysis worksheets. Urban Crossroads, who prepared the Project Traffic Analysis (Appendix N-2), provided responses to the City of Moreno Valley on May 19, 2022, as follows:

10. Per the approved scoping agreement, a queuing analysis is only provided for the off-ramp movements at the study area off-ramp intersections. As such, a queuing analysis for all study area intersections has not been provided.

The City of Moreno Valley did not raise this issue further.

A-4.33 This comment from the City of Moreno Valley Transportation Engineering Division 1st Review Comments dated March 18, 2022 was submitted prior to the release of the Draft EIR and concurred in the VMT conclusion. Urban Crossroads, who prepared the Project VMT Analysis (Appendix N-1), provided responses to the City of Moreno Valley on May 19, 2022, as follows:

11. Comment noted, no changes to the VMT analysis are necessary.

A-4.34 This comment from the City of Moreno Valley Transportation Engineering Division 2nd Review Comments dated July 1, 2022 was submitted prior to the release of the Draft EIR and requested additional information be provided in the plot plans for Buildings B and C. All points have been incorporated into the plot plans.

A-4.35 This comment from the City of Moreno Valley Transportation Engineering Division 2nd Review Comments dated July 1, 2022 was submitted prior to the release of the Draft EIR and requested additional information be provided in the tentative parcel map. All points have been incorporated into the tentative parcel map.

A-4.36 This comment from the City of Moreno Valley Transportation Engineering Division 2nd Review Comments dated July 1, 2022 was submitted prior to the release of the Draft EIR and requested revisions to the proposed Specific Plan regarding Cactus Avenue bike lanes, designation of Cactus Avenue east of Linebacker Drive, and sight distance for fences and walls. The comment does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. See Response A-4.17, above, regarding Cactus Avenue Class II bicycle lanes. See Response A-4.18, above, regarding Figure

5-1 of the Specific Plan. Sight distance specifications are included as part of the March JPA improvement plan design standards and Riverside County Standards.

Comment Letter A-5

From: Castellanos, David <DCastellanos@socalgas.com>
Sent: Tuesday, March 7, 2023 7:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau
Attachments: 20230307074009.pdf

Good morning Dan,

There is 30" High Pressure Transmission gas line that runs in that area. A-5.1

Thanks,

David Castellanos
Lead Planning Associate
Work Planning & Resource Management
Southeast Region
dcastellanos@socalgas.com
213-231-7876



MARCH JOINT POWERS AUTHORITY

NOTICE OF AVAILABILITY OF DRAFT EIR

Project Title:	West Campus Upper Plateau
Project Location – Specific; Identify street address and cross streets or attach a map showing project site (preferably a USGS 15' or 7 1/2' topographical map identified by quadrangle name):	Located at the extended alignments of Cactus Avenue and Barton Street, identified in the attached USGS map.
Project Location – Agency:	March Joint Powers Authority
Project Location – County:	Riverside

Description of Nature, Purpose, and Beneficiaries of Project:

A proposal by Meridian Park, LLC for a General Plan Amendment, Specific Plan, Zone Change, Tentative Parcel Map, two Plot Plans, and a Development Agreement to redevelop the former Air Force munitions bunkers and adjacent land. The Project consists of the following components: The Specific Plan Area is a campus development with a buildout scenario including 10 Business Park parcels totaling 65.32 acres, 6 Mixed Use parcels totaling 42.22 acres, 3 Industrial parcels totaling 143.31 acres, 2 Public Facility parcels totaling 2.84 acres, 3 open space parcels totaling 17.72 acres and public streets totaling 37.91 acres. Plot Plans for Buildings B and C totaling 1,837,000 square feet would be constructed on two of the Industrial Parcels. The remaining parcels would be developed with square footages as allowed under the Specific Plan. A proposed park component of the Project, consisting of 60.28-acres located west of the Barton Street extension, is included under the Specific Plan buildout scenario. Infrastructure improvements would include the installation of utility and roadway networks connecting to and throughout the Specific Plan Area, the construction of a new sewer lift station, the construction of a new electrical substation, and the construction of a new 0.5-million-gallon reclaimed water tank. Vehicular access at the Cactus Avenue and Barton Street location is prohibited, except emergency vehicles through a Knox box gate. Through a recorded Conservation Easement of approximately 445.43 acres, the undisturbed land surrounding the Specific Plan Area would be preserved in perpetuity, consistent with prior determinations made as part of the CBD Settlement Agreement.

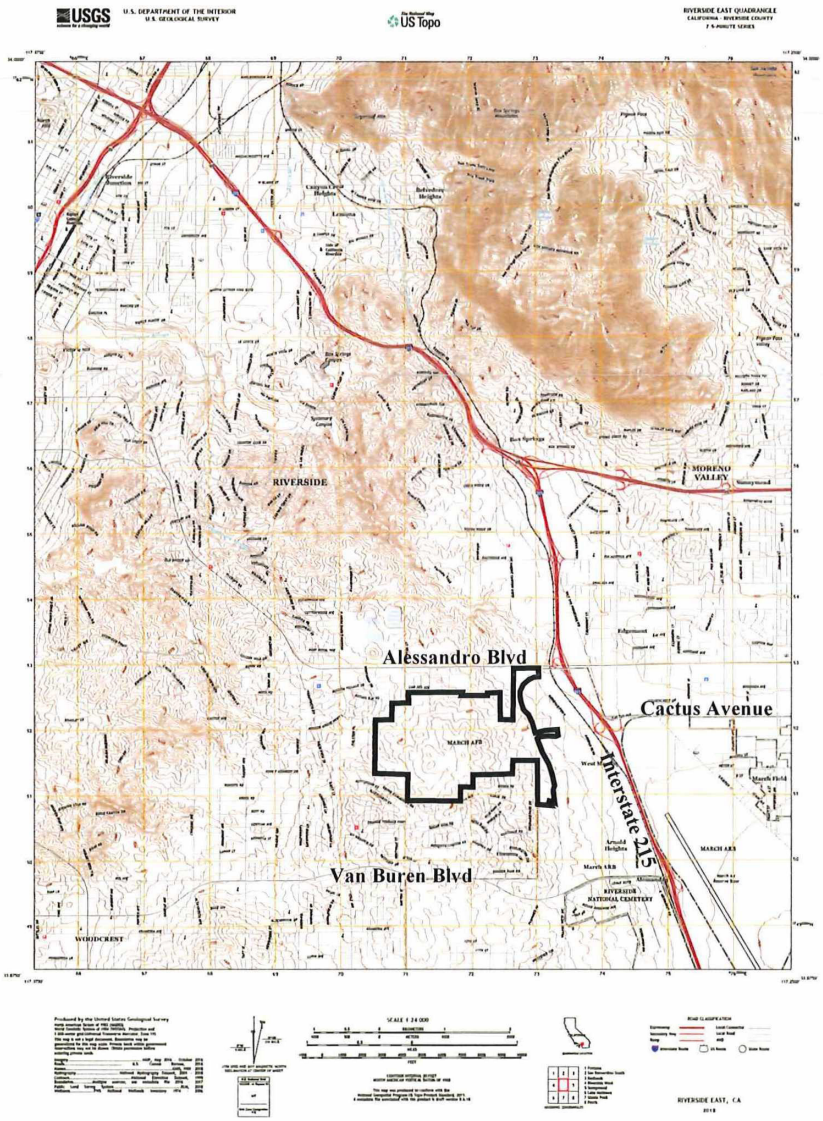
Environmental Impacts Determined to be Significant:

Significant environmental impacts are identified with operational air quality, historical and archaeological resources, tribal cultural resources, and operational traffic noise, which are significant and unavoidable. Cumulative impacts associated with operational air quality were also identified as being significant and unavoidable.

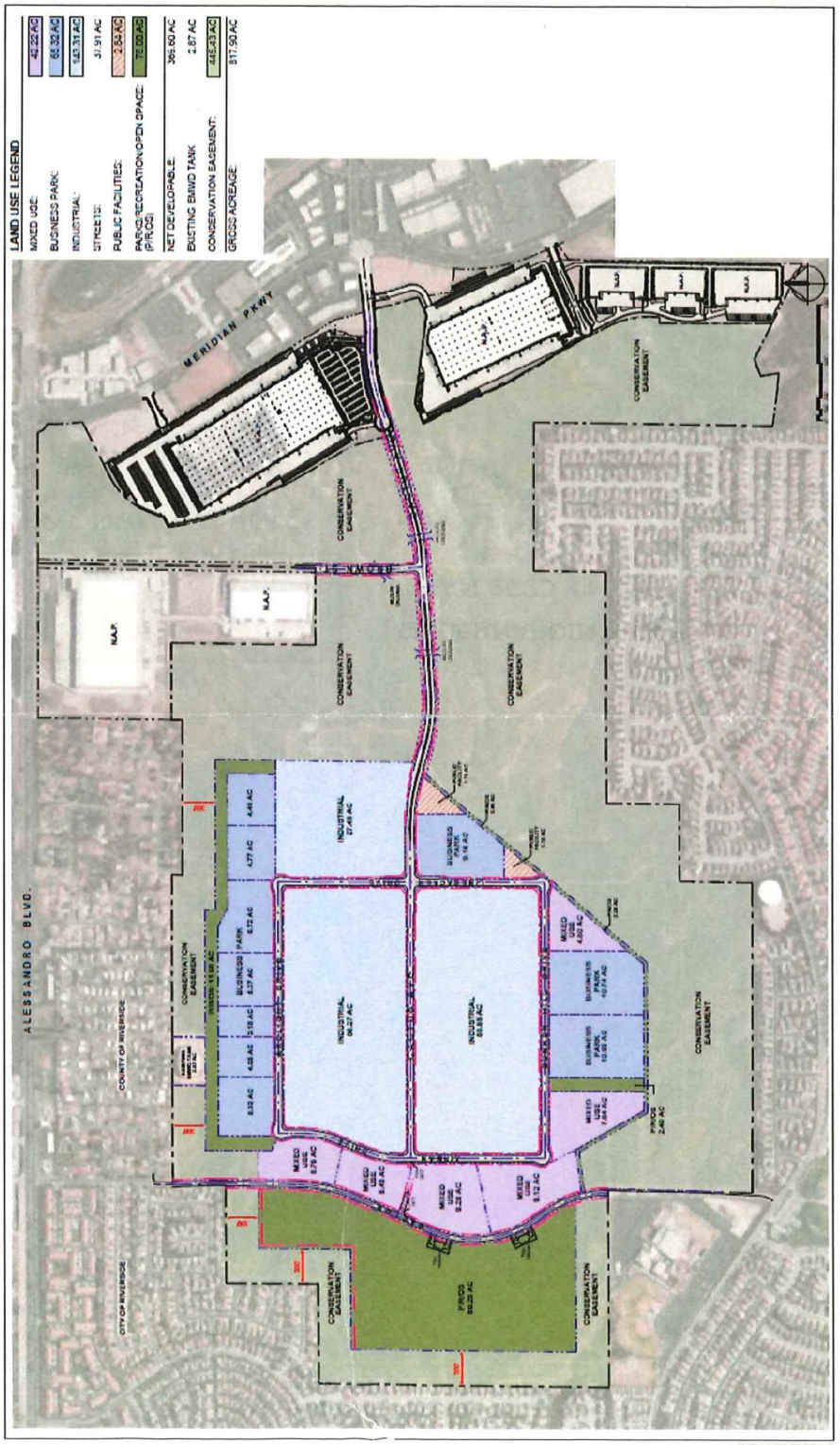
Project Site – Specify if project site is included on any list of hazardous waste facilities:	The Department of Toxic Substances Control's EnviroStor database and SWRCB's GeoTracker database identify the Project site is not located on a site with known contamination (SWRCB 2021) or hazardous materials site (DTSC 2021).
Place and time of scheduled meetings:	To Be Determined
Lead Agency:	March Joint Powers Authority
Division	Planning Department
Date when project noticed to public:	January 9, 2023

Address where copy of the EIR is available and how it can be obtained in an electronic format: March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside CA, 92518 https://marchjpa.com/mjpa-meridian-west-campus/	
Review Period:	January 9, 2023 – March 10, 2023
Contact Person:	Dan Fairbanks, Planning Director: fairbanks@marchjpa.com
Contact Person's Telephone (Area Code/Extension:	(951) 656-7000

USGS Map



Land Use Plan



NOTICE OF AVAILABILITY OF A DRAFT EIR FOR THE WEST CAMPUS UPPER PLATEAU PROJECT

MARCH JOINT POWERS AUTHORITY
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Riverside, CA 92518

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The Southern California Gas Company
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Date Mailed: January 9, 2023

91754-093299

Letter A-5

SoCal Gas
March 7, 2023

A-5.1 This comment identifies a 30-inch High Pressure Transmission gas line running through the Project site and does not raise concerns about the adequacy of the environmental analysis in the Draft EIR. Recirculated Chapter 3, Project Description, identifies the Project would require the relocation of SoCal Gas's gas line and states; "As part of grading activities for the Specific Plan Area, the alignment of the gas line would be adjusted to be consistent with the grading activities completed at the Project site. SoCal Gas will be responsible for carrying out the pipeline improvements; however, this EIR will provide the environmental review and clearance for SoCal Gas to proceed with the adjustment of the grade of the gas line to the proposed finished grading surface."

It is March JPA's understanding that the developer has contacted SoCalGas about relocating the existing gas as part of the proposed development. Based on information provided to March JPA by the developer's project surveyor, the project title company has found that SoCalGas has partial easements over the property for the existing gas line. See attached Figure A-5.1 showing locations of the currently known easements.

The Draft EIR analyzed the environmental impacts of the SoCal Gas line relocation as part of the Infrastructure Improvements of the Specific Plan Area. No changes or revisions to the Draft EIR are required in response to this comment.

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Comment Letter A-6

From: Ebru Ozdil <eozdil@pechanga-nsn.gov>
Sent: Thursday, March 9, 2023 5:02 PM
To: Dan Fairbanks
Cc: Molly Earp; Cole Bauman; Tina Thompson Mendoza
Subject: Pechanga Tribe Comments on the West Campus Upper Plateau DEIR
Attachments: Pechanga Tribe Cmnts on DEIR West Campus Upper Plateau 3.9.2023.pdf

Dear Mr. Fairbanks,

This letter is written on behalf of the Pechanga Band of Indians (hereinafter, "the Tribe') a federally recognized Indian tribe and sovereign government in response to DIER notice for the above named project. The Tribe noticed that cultural resources reports for this project been listed in the public Draft EIR documents, and that they are accessible online under the technical appendix section. Public Resources Code §6254(r) strictly prohibits publications of "records of Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects…". We request that this information, as well as sensitive information provided in Appendix E-1 and E-2 be removed from the Draft EIR documents listed on the March JPA website and included in the confidential Appendix. A-6.1

Please add the Tribe to your distribution list(s) for public notices and circulation of all documents and we further requests to be directly notified of all public hearings and scheduled approvals concerning this Project, and that these comments be incorporated into the record of approval for this Project. The Tribe looks forward to working together with the March JPA in protecting the invaluable Pechanga cultural resources found in the Project area. Please do not hesitate to contact me if you have any questions.

Thank you

Ebru T. Ozdil
Cultural Analyst
Pechanga Cultural Resources Department
P.O. Box 2183
Temecula, CA 92593

Office: (951) 770-6313
Fax: (951) 693-2314

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PECHANGA CULTURAL RESOURCES
Pechanga Band of Indians

Post Office. Box 2183 • Temecula, CA 92593
Telephone (951) 770-6300 • Fax (951) 506-9491

Chairperson:
Neal Ibanez

Vice Chairperson:
Bridgett Barcello

Committee Members:
Darlene Miranda
Richard B. Scearce, III
Robert Villalobos
Shevon Torres
Juan Rodriguez

Direcctor:
Gary DuBois

Coordinator:
Paul Macarro

Cultural Analyst:
Tuba Ebru Ozdil

March 9, 2023

VIA E-MAIL and USPS

Mr. Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: Pechanga Tribe Comments on the Draft Environmental Impact Report for West Campus Upper Plateau

Dear Mr. Fairbanks:

This comment letter is written on behalf of the Pechanga Band of Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2 and Cal. Govt. C. 65351, 65352 and 65352.3 & .4, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). Please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project. A-6.2

The Tribe submits these comments concerning the Project's potential impacts to Tribal Cultural Resources (TCR) in conjunction with the environmental review of the Project. The Tribe has been in consultation directly with March Joint Powers Authority (March JPA) on the sensitivity of the Project and its impacts to the cultural resources. After review of the Draft Environmental Impact Report (EIR), the Tribe has several concerns. First and foremost, the Tribe is especially concerned that the Draft Environmental Impact Report (DEIR) has been issued and mitigation measures were included in the cultural and TCR section of the document, while Phase II archeological testing plan and AB 52 consultation is still outstanding. The purpose of a Phase II investigation is to continue needed information gathering work toward the identification/nature, boundaries, and significance of a cultural resources. Careful and detailed documentation need to be included in Phase II reports. If and when the site boundaries are determined and significance assumed, then the project require either further avoidance and preservation, or to include mitigation measures to reduce or avoid any potentially significant impacts. The Tribe is disconcerted that the draft EIR does not assume significance, but rather A-6.3

mitigates the project for an Archeological Testing Plan (ATP) as identified in MM-CUL-1. The Tribe requests the Phase II testing plan to be completed, the development design to be finalized, and additional TCR measures to be incorporated, if needed, prior to the release of the Final EIR. A-6.3 Cont.

Secondly, the Ethnographic Section clearly identifies that the project area is within *'Atáaxum* (Luiseño) territory, however, there is a section on the Gabrielino. The territory description in the Gabrielino section does not even include the project area. In addition, the Gabrielino are not listed in Native American Heritage Commissions list of Native American Contacts under the assembly Bill 52/Senate Bill 18 list for the project. Please see Table 4.16-2 for your reference. The Tribe requests all ethnographic information and references to the Gabrielino to be removed from the Draft EIR. A-6.4

THE MARCH JPA MUST INCLUDE INVOLVEMENT OF AND CONSULTATION WITH THE PECHANGA TRIBE IN ITS ENVIRONMENTAL REVIEW PROCESS

It has been the intent of the Federal Government[1] and the State of California[2] that Indian tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments. In this case, it is undisputed that the project lies within the Pechanga Tribe's traditional territory. Therefore, in order to comply with CEQA and other applicable Federal and California law, it is imperative that the March Joint Powers Authority consult with the Tribe in order to guarantee an adequate knowledge base for an appropriate evaluation of the Project effects, as well as generating adequate mitigation measures. A-6.5

PECHANGA CULTURAL AFFILIATION TO PROJECT AREA

The Pechanga Tribe asserts that the Project area is part of *'Atáaxum* (Luiseño), and therefore the Tribe's, aboriginal territory as evidenced by the existence of *'Atáaxum* place names, *tóota yixélval* (rock art, pictographs, petroglyphs), and an extensive associated artifact record within and in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Band of Indians because of the Tribe's cultural ties to this area as well as extensive history with both this Project and other projects within the area. A-6.6

[1]See e.g., Executive Memorandum of April 29, 1994 on Government-to-Government Relations with Native American Tribal Governments, Executive Order of November 6, 2000 on Consultation and Coordination with Indian Tribal Governments, Executive Memorandum of September 23, 2004 on Government-to-Government Relationships with Tribal Governments, and Executive Memorandum of November 5, 2009 on Tribal Consultation.
[2] See California Public Resource Code §5097.9 et seq.; California Government Code §§65351, 65352.3 and 65352.4

The Tribe's knowledge of their ancestral boundaries is based on reliable information passed down to them from their elders; published academic works in the areas of anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. Many anthropologists and historians who have presented boundaries of the *'Atáaxum* traditional territory have included Moreno Valley, the March Air Reserve Base (MARB) and the March Joint Powers Authority (March JPA) areas in their descriptions (Drucker 1937; Heiser and Whipple 1957; Kroeber 1925; Smith and Freers 1994), and such territory descriptions correspond with what was communicated to the Pechanga people by their elders. While historic accounts, anthropological and linguistic theories are important in determining traditional *'Atáaxum* territory; the Tribe asserts that the most critical sources of information used to define their traditional territories are their songs, creation accounts and oral traditions.

'Atáaxum history originates with the creation of all things at *'Éxva Teméeku*, in the present-day City of Temecula, and dispersing out to all corners of creation (what is today known as Luiseño territory). It was at Temecula that the *'Atáaxum* deity *Wuyóot* lived and taught the people, and here that he became sick, finally expiring at Lake Elsinore. Many of the "Atáaxum songs relate the tale of the people taking the dying *Wuyóot* to the many hot springs, and finally to those at Elsinore, where he died (DuBois 1908). He was cremated at *'Éxva Teméeku*. It is the *'Atáaxum* creation account that connects Elsinore to Temecula, and thus to the Temecula people who were evicted and moved to the Pechanga Reservation. From Temecula, the people spread out, establishing villages and marking their territories. The first people also became the mountains, plants, animals and heavenly bodies.

A-6.6
Cont.

Many traditions and stories are passed from generation to generation by songs. One of the *'Atáaxum* songs recounts the travels of the people to Elsinore after a great flood (DuBois 1908). From here, they again spread out to the north, south, east and west. Three songs, called *Moníivol*, are songs of the places and landmarks that were destinations of the *'Atáaxum* ancestors, they describe the exact route of the Temecula (Pechanga) people and the landmarks made by each to claim title to places in their migrations (DuBois, Constance. "The Religion of the Luiseño Indians of Southern California." Berkeley: *American Archaeology and Ethnology*, Vol 8. No.3, 1908:110). The Native American Heritage Commission (NAHC) Most Likely Descendent (MLD) files substantiate this habitation and migration record from oral tradition. These examples illustrate a direct correlation between the oral tradition and the physical place; proving the importance of songs and stories as a valid source of information outside of the published anthropological data.

Tóota yixélval (rock art) is also an important element in the determination of *'Atáaxum* Luiseño territorial boundaries. *Tóota yixélval* can consist of petroglyphs (incised) elements, or pictographs (painted) elements. The science of archaeology tells us that places can be described through these elements. Riverside and Northern San Diego Counties are home to red-pigmented pictograph panels. Archaeologists have adopted the name for these pictograph-versions, as defined by Ken Hedges of the Museum of Man, as the San Luis Rey style. The San Luis Rey style incorporates elements which include chevrons, zig-zags, dot patterns, sunbursts,

handprints, net/chain, anthropomorphic (human-like) and zoomorphic (animal-like) designs. Tribal historians and photographs inform us that some design elements are reminiscent of *'Atáaxum* ground paintings. A few of these design elements, particularly the flower motifs, the net/chain and zig-zags, were sometimes depicted in *'Atáaxum* basket designs and can be observed in remaining baskets and textiles today.

An additional type of *tóota yixélval*, identified by archaeologists also as rock art or petroglyphs, are cupules. Throughout *'Atáaxum* territory, there are certain types of large boulders, taking the shape of mushrooms or waves, which contain numerous small pecked and ground indentations, or cupules. One of these cupule boulders have been identified within the Project. Additionally, according to historian Constance DuBois:

> When the people scattered from Ekvo Temeko, Temecula, they were very powerful. When they got to a place, they would sing a song to make water come there, and would call that place theirs; or they would scoop out a hollow in a rock with their hands to have that for their mark as a claim upon the land. The different parties of people had their own marks. For instance, Albañas's ancestors had theirs, and Lucario's people had theirs, and their own songs of Munival to tell how they traveled from Temecula, of the spots where they stopped and about the different places they claimed (1908:158).

A-6.6 Cont.

Thus, the *'Atáaxum* songs and stories, indigenous place names, as well as academic works, demonstrate that the *'Atáaxum* people who occupied what we know today as Riverside, Moreno Valley, Perris and the surrounding landscape are ancestors of the present-day *'Atáaxum*/Pechanga people, and as such, Pechanga is culturally affiliated to this geographic area. Further, the Pechanga Tribe was designated as the affiliated Tribe by LSA Associates for the March JPA and the MARB (Schroth 1999).

The Tribe welcomes the opportunity to meet with the March JPA to further explain and provide documentation concerning our specific cultural affiliation to lands within your jurisdiction.

REQUESTED REVISIONS DEIR AND TO THE MITIGATION MEASURES

Pechanga is not opposed to this Project; however, we are opposed to any direct, indirect and cumulative impacts this Project may have to TCR's. The Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources, which includes both the protection of unique and irreplaceable cultural resources, such as *'Atáaxum* village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work.

A-6.7

The proposed Project is on land that is within the traditional territory of the Pechanga Band of Indians. The Pechanga Band is not opposed to this Project; however, we are opposed to any direct, indirect and cumulative impacts this Project may have to tribal cultural resources. The Tribe's primary concerns stem from the Project's proposed impacts on Tribal Cultural Resources (TCR's) and Traditional Cultural Landscapes (TCL's). The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as landscapes, *'Atáaxum* village sites, sacred sites and TCR's which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work.

A-6.7 Cont.

The Tribe does not agree with the inclusion of the cultural resources reports in the public Draft EIR documents, and that they are accessible online under the technical appendix section. Public Resources Code §6254(r) strictly prohibits publications of "records of Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects…". We request that this information, as well as sensitive information provided in Appendix E-1 and E-2 be removed from the Draft EIR documents listed on the March JPA website and included in the confidential Appendix.

A-6.8

As stated above, the Tribe requests the archeological Phase II testing plan to be completed, in coordination with the Tribe prior to the finalization of the Final EIR. The site boundaries and significance determinations need to be completed in consultation with the Tribes, as well as agreement to avoidance measures and appropriate mitigation measures, if needed. Please note that the Tribe will provide some edits to the mitigation measure in this document as it is proposed; however, there might be additional avoidance and measures requested once the Phase II testing and report has been completed. CEQA environmental documents cannot be completed until the proper assessment is done. The Tribe urges March JPA to be cautious of getting into the realm of deferred mitigation on this subject matter.

A-6.9

In addition, the DEIR should summarize the information conducted during the entitlement process (Phase I & II archaeological reports) and should not include the actual report, especially information regarding site record search data or cultural resources. Therefore, the entirety of section **4.16.1 Existing Conditions** should be removed and summarized **except for the Native American Coordination and Consultation.** If these sections are to be included, the Tribe requests that the Final EIR acknowledge the Tribe's following comments and concerns.

A-6.10

Section **4.16.1 Late Prehistoric Period and Ethnographic Section** makes the statement that, "Many Luiseño hold the world view that as a population they were created in Southern California; however, archaeological and anthropological data proposes a scientific/archaeological perspective. Archaeological and anthropological evidence suggests that at approximately 1,350 YBP, Takic-speaking groups from the Great Basin region moved into Riverside County, marking the transition to the Late Prehistoric Period" and "the Luiseño were Takic-speaking people more closely related linguistically and ethnographically to the Cahuilla,

A-6.11

Gabrielino, and Cupeño to the north and east rather than the Kumeyaay who occupied territory to the south". The above statements are a misclassification of the *'Atáaxum*, language and their territory. The *'Atáaxum* o recognize that the world was created in the area now known as Temecula[3], and the *'Atáaxum* People have been in this area since the beginning of time, the *'Atáaxum* never migrated into the area. Linguistic theory and archaeological data now support the view that the *'Atáaxum* were in California before the "Shoshonean Intrusion" occurred. The preconception that Luiseño is a Shoshonean language was a theory introduced in the 1890s and has long since been abandoned. The Tribe further maintains that this supposed theory has *never* been proven, by way of the Scientific Method and it should at best, be considered an abandoned hypothesis being put forth by archaeologists not linguists. Beginning in the 1960s and 70s linguistic researched reclassified the Uto-Aztecan language family into two branches the Northern and Southern. Within those branches the Shoshonean language falls within the Numic branch of the larger U-A family. "Shoshonean" is not a recognized language group, but it falls within the Central Numic sub-branch and is a language spoken by Shoshonean people. Luiseño is recognized as being within the southern Uto-Aztecan language family in the Takic sub-branch. Some current sources on the Uto-Aztecan family are as follows: Victor Golla, 2011, California Indian Languages, University of California Press, Berkeley, Pg. 169-188; Lyle Campbell, 1997, American Indian Languages: The Historical Linguistics of Native America, Oxford University Press, New York, pgs. 133-138; Marianne Mithun, 1999, The Languages of Native North America, Cambridge University Press, Cambridge, pgs. 539-548. Therefore, the Tribe would like to assert that the "Shoshonean Wedge" theory is no longer supported by current research and all mention of the "Shoshonean Intrusion" be removed throughout the cultural section of the DEIR for this project. Additionally, the statement that the Luiseño had no word for their nationality is wildly incorrect. The Luiseño called themselves 'Atáaxum, which means "people," and traditional songs refer to the people as Payómkawichum "people of the west." (Constance Goddard DuBois, 1908, The Religion of the Luiseño Indians of Southern California, University of California Publications in American Archaeology and Ethnography, pgs. 138, 159.) The people were also associated with their villages, for example, today the Pechanga people refer to themselves as the "Pecháangayam," the people of Pechanga.

A-6.11 Cont.

At this time, the Tribe has several edits to the proposed mitigation measures; however, more specific measures might need to be included in the Final EIR after the completion of the Phase II archeological testing plan. We request that these mitigation measures be incorporated into the final EIR, with the revisions and editions provided below, and into any other appropriate final environmental documents approved by the March JPA. (Underlines are additions, Strikeouts are deletions.)

A-6.12

MM-CUL-1 Archaeological Testing Plan (ATP)

[3] Masiel-Zamora, Myra, 2016, *'Éxva Teméeku: Where We Began*. Great Oak Press, Pechanga, California.

Prior to the ~~issuance of any grading permits~~ Final EIR, the project applicant shall submit an ATP, approved by the consulting tribes (Pechanga Band of ~~Luiseño~~ Indians and Soboba Band of Luiseño Indians), that details the procedures to fully document the boundaries of resources within or directly adjacent to the APE (CA-RIV-4067, CA-RIV-4068, CA-RIV-5420, CA-RIV-5421, CA-RIV-5811, CA-RIV-5812, CA-RIV-5819, Temp-2, Temp-3, and Temp-9 to Temp-15), determine the resource's potential for inclusion in the CRHR, and ensure adequate mitigation measures are set forth for their respective resources, in consultation with the tribes.

The testing program shall avoid any unnecessary excavation of significant deposits, should they be discovered, to minimize archaeological impacts to the site. This testing would only occur at these specific resources along the periphery of the area of impact. The number of shovel test pits (STPs) will vary, with an anticipated range of four to 15 per site. During all field studies, a representative from Pechanga and Soboba will ~~be requested to~~ participate in and monitor the testing program.

Based on the testing results, additional mitigation measures may be incorporated in the Final EIR.

MM-CUL-2 Cultural Resources Monitoring Plan (CRMP)

A-6.12 Cont.

~~After implementation of the ATP and~~ At least thirty (30) days prior to the issuance of any grading permits, the project applicant shall prepare a Cultural Resource Monitoring Plan (CRMP), in consultation with the Tribes, to explicitly detail the methods and procedures for avoidance and protection measures for cultural resources and the procedures for the inadvertent discovery of unrecorded cultural resources. The treatment of the resource(s) will be consistent with the terms and provisions of the mitigation and CRMP may be amended by the March JPA, applicant, and Tribes as agreed upon. Prior to finalization, the Principal Investigator/Archeologist will circulate the draft CRMP to March JPA and Consulting Tribes for review and comment. The final document will include methods and practices and other appropriate issues that may be relevant to the culturally appropriate treatment of resources. This CRMP shall include but not be limited to the following guidelines:

- The CRMP shall be prepared by an archaeologist meeting the Secretary of the Interior Standards, in consultation with consulting tribe(s) (Pechanga Band of ~~Luiseño~~ Indians and Soboba Band of Luiseño Indians), the developer, and March JPA, and completed prior to any development within the APE.
- All ground disturbing activities within the Project shall be monitored by a qualified archaeologist and Native American monitor(s).
- The report shall include the protocols and stipulations that the contractor. March JPA. Pechanga Band of Indians and Soboba Band of Luiseño Indians, and

Principal Investigator/Archeologist will follow in the event of inadvertent cultural resources.

- The monitoring frequency and coverage area may be adjusted based on observed sensitivity for encountering cultural resources by the qualified archaeologist in consultation with the tribes and March JPA.
- If any human remains are discovered, the Riverside County Coroner, Tribes and March JPA shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted in order to determine proper treatment and disposition of the remains.
- The report shall include details of the relocation and control grading operations. Such as, all ground disturbing activities within 10 to 15 feet, at minimum, of a recorded archaeological feature shall be conducted in a controlled fashion, slowly and deliberately, to ensure any potential subsurface resources will be identified. If and when needed, this area may be extended based on consultation with the Tribes.
- The CRMP shall include the mitigation measures developed in consultation with the tribes after implementation of the ATP.
- Type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items.
- Contact information of relevant individuals for the Project.

A-6.12 Cont.

MM-CUL-3 Contractor Specifications

Following the completion of the ATP and CRMP and prior to issuance of any grading permit, the Project applicant shall provide evidence, to March JPA's and Consulting tribes satisfaction, that the approved provisions/recommendations as determined in the CRMP are included in Contractor Specifications. The specifications shall include but not be limited to the following:

- "The features outside of the area of direct impact (CA-RIV-4068 Feature A; CA-RIV-5420 Features A, B, C, D, and E; CA-RIV-5421 Feature 1; CA-RIV-5811 Features 1 and 2; CA-RIV-5812 Features 8 and 9; CA-RIV-5819 Features 1, 2, and 3; Temp-9 Feature A; and Temp-14 Feature (A) shall be preserved."
- The Contractor Specifications shall include the mitigation measures developed in consultation with the tribes after implementation of the ATP.
- "Controlled grading within 10 to 15 feet of a recorded archaeological feature shall be implemented and archeologist and/or Tribes may request additional areas to be controlled graded based on the finding."
- "Should any cultural resources be discovered during earth-moving activities, no further grading shall occur in the area of the discovery until the Planning Director

and Tribes are ~~is~~ satisfied that adequate provisions are in place to evaluate and protect these resources." This condition and the approved provisions/recommendations as determined in the CRMP, shall be incorporated on the cover sheet of the grading plan.

MM-CUL-4 Workers Environmental Awareness Program (WEAP) Training

An archaeologist meeting the Secretary of the Interior Standards and Native American monitor(s) shall attend a pre-grading meeting to conduct a WEAP training regarding cultural and archaeological sensitivity for all construction personnel and monitors who are not trained archaeologists. A PowerPoint presentation and handout or pamphlet shall be prepared, in consultation with the Tribes, to ensure proper identification and treatment of inadvertent discoveries. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources and tribal cultural resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources, tribal cultural resources, or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor, archaeological monitor and tribal monitor(s).

MM-CUL-5 Native American ~~and Archeological~~ Monitoring

A-6.12
Cont.

A Native American Monitor and Secretary of Interior Qualified Archaeologist shall be present during all earth-moving construction activities. At least 30 days prior to issuance of grading permits, separate agreements shall be developed with each monitoring Native American Tribes, addressing the roles of the Developer/Applicant, the Qualified Archaeologist, and the Consulting Tribe(s). The Developer/Applicant shall submit fully executed copies of the following to the March JPA: (1) the contract for the retention of an archaeologist; ~~(2) the contract between the Tribe(s) for Tribal monitoring;~~ (~~3~~2) the contracts individually between the Tribe(s) and the land owner/Applicant/Developer for the monitoring of the Project construction. ~~Archaeological monitoring shall occur as outlined in the CRMP~~. The monitoring contracts shall include, but not limited to, outlining provisions and requirements for addressing the treatment of cultural resources; project grading and development scheduling; terms of compensation for the monitors; treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on the site; and establishing on-site monitoring provisions and/or requirements for professional monitoring during ground disturbing activities. The monitors have the authority to temporarily divert and stop earth moving activities in the event that suspected cultural resources area unearthed. The monitors will be responsible for maintaining weekly monitoring logs, the Developer shall identify an individual on site to sign the weekly logs.

MM-CUL-6 Archeological Monitoring

Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all mass grading and trenching activities. The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. Archaeological monitoring shall occur as outlined in the CRMP.

MM-CUL-67 Avoid Environmentally Sensitive Areas (ESA).

Prior to the issuance of grading permits, all features recommended to be preserved in place shall be fenced off with construction fencing and identified as ESAs to ensure Project personnel do not disturb the features. The installation of the ESA fencing shall be monitored by the project archeologist and Tribal Monitors. Specific requirements pertaining to the avoidance buffer, style, materials, access, maintenance, and other requirements shall be provided within the CRMP.

MM-CUL-78 Inadvertent Discovery of Archaeological Resources

In the event that archaeological resources or tribal cultural resources are inadvertently unearthed during excavation and grading activities for the Project, that were not assessed by the archeological report(s) and/or environmental assessments conducted prior to Project approval, the following procedures shall be allowed. ~~the contractor shall cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The Project cultural resources professionals, including the consulting Tribe(s)appropriate tribe(s), shall evaluate the significance of the find and determine the appropriate course of action.~~ Unique cultural resources are defined, for this condition only, as being multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Consulting Tribes. Tribal cultural resources are excluded from the definition of unique cultural resources as those resources are defined by the tribal values ascribed to them by their affiliated communities. Treatment of tribal cultural resources inadvertently discovered during the project's ground-disturbing activities shall be subject to the consultation process required by state law and AB 52.

~~If avoidance of the resources is not feasible, salvage operation requirements pursuant to Section 15064.5 of the CEQA Guidelines shall be followed and shall take into account tribal preferences and sensitivity concerns.~~ The contractor shall cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The Project cultural resources professionals, including the consulting Tribe(s)~~appropriate tribe(s),~~ March JPA and applicant shall meet to evaluate the significance of the find and determine the appropriate course of action. At the meeting, the significance of the discoveries shall

A-6.12
Cont.

be discussed and after consultation with the Tribal Representative(s) and the Principal Archeologist, a decision shall be made, with the concurrence of the March JPA, as to the appropriate mitigation (documentation, avoidance, recovery, etc.) for the cultural resource. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors, if needed. After the find has been appropriately avoided or mitigated and cleared by March JPA, the Project cultural resources professional and, if applicable, the Native American monitor(s), work in the area may resume. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the Consulting Tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/ Mitigation Measures. Pursuant to California Public Resources Code Section 21083.2(b), avoidance is the preferred method of preservation for archaeological resources. If the Developer, the Project archaeologist and the Native American Monitor(s) cannot agree on the significance or the mitigation for such resources, these issues will be presented to the March JPA Planning Director for decision. The March JPA Planning Director shall make a determination based on the provisions of CEQA with respect to archaeological and tribal cultural resources and shall take into account the religious beliefs, customs, and practices of the appropriate Native American tribes. Notwithstanding any other rights available under the law, the decision of the March JPA Planning Director shall be appealable to the March JPA Commission.

A-6.12
Cont.

If potentially significant features or sites are discovered, an Evaluation Plan shall be developed by the Project archaeologist and the applicable Native American representative and shall contain, at a minimum, a research design and field methodology designed to address the criteria outlined in the CRHR. If a site is determined to be significant, as confirmed by March JPA, and avoidance, preservation and protection in place of the site has not been archived, a Phase III data recovery ~~excavations~~ plan shall be prepared by the Principal Archeologist, in consultation with the Consulting Tribes, and shall be submitted to the March JPA for review and approval prior to implementation of the said plan. ~~may be necessary unless the resource is avoided and preserved/protected in place.~~ Evaluation and treatment shall be supervised by an individual or individuals that meet the Secretary of the Interior's Professional Qualification Standards. If the Tribe(s) disagree with regard to the determined significance of the discovery and/or the proposed management strategy for a cultural resource of Native American origin or cultural importance, these issues will be presented to the March JPA Planning Director for decision. The March JPA Planning Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the Project's archaeological Principal Investigator and shall consider the cultural and

religious practices of the Tribe(s). Notwithstanding any other rights available under the law, the decision of the March JPA Planning Director shall be appealable to the March JPA Commission.

MM-CUL-9 Final Disposition

In the event that Native American Cultural resources are identified during Project earthwork and ground-disturbing activities, the following procedures shall be carried out for final disposition; One or more of the following treatments, in order of preference, shall be employed in consultation with the Consulting Tribes. Evidence of such shall be provided to the City of Murrieta.

1. Preservation-In-Place of the cultural resources. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resource(s).

2. Reburial of the cultural resource(s) on the Project property. The Preservation Site(s) will be located within the Project site development envelope of the Project, outside of any known and identified cultural resource sites. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the City under a confidential cover and not subject to Public Records Request.

A-6.12
Cont.

MM-CUL-10 Controlled Grading and Grubbing.

All grading shall be controlled in areas of concern as determined by the Principal Investigator/Archaeologist and with the Consulting Tribes and as reflected in CRMP. The identified area shall be inspected by the Principal Investigator/Archaeologist and Native American monitor prior to initiating grading for those areas. Grading shall be controlled within the Environmentally Sensitive Buffer Area using a slope board or similar equipment to allow soil to be removed in increments of only a few inches at a time. Other areas which may require controlled grading shall be determined by the Principal Investigator/Archaeologist and the Native American monitor(s) based on the results and soil types identified during grading. Should any changes be needed, an updated exhibit will be produced and approved by all parties prior to any ground disturbance in the newly identified area.

MM-CUL-811 Archaeological Monitoring Report (Phase IV)

A report, prepared by an archaeologist meeting the Secretary of the Interior Standards, documenting monitoring activities conducted by a qualified archaeologist and Native American monitor(s) shall be submitted to March JPA within 60 days of completion of grading or other Project-related activities with the potential to impact archaeological or tribal cultural resources. This report shall document the known resources on the property, describe how each mitigation measure was fulfilled, and document the type of cultural resources recovered and the disposition of such resources. The report will be submitted to March JPA, the Eastern Information Center, and the appropriate tribe(s).

MM-CUL-12 Human Remains

In the event that human remains are inadvertently encountered during construction activities, all work is to immediately stop and no further disturbance shall occur in the area until the County Coroner has made the necessary findings as to origin. The remains and associated resources shall be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the Project site or any nearby (no less than 100 feet) area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to immediately notify the Native American Heritage Commission (NAHC). The NAHC must immediately notify those persons it believes to be the most likely descendant (MLD) . The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

A-6.12 Cont.

MM-CUL-13 Non-Disclosure

It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The coroner, pursuant to the specific exemption set forth in California Government Code 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).

The Pechanga Tribe looks forward to working together with the March JPA in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-6313 or at eozdil@pechanga-nsn.gov once you have had a chance to review these comments so that we might address any additional outstanding issues concerning the Phase II testing plan and additional avoidance and mitigation language. Thank you for continuing to partner with the Pechanga Band of Indians to preserve and protect our sensitive cultural heritage.

A-6.13

Sincerely,



Tuba Ebru Ozdil
Cultural Analyst

Cc Pechanga Office of the General Counsel

Letter A-6

Pechanga
March 9, 2023

A-6.1 This comment is a transmittal email that also requests the removal of sensitive information provided in Appendix E-1 and E-2 of the Draft EIR as well as requesting that the Tribe be added to the distribution lists for public notices and circulated documents. The sensitive information has been removed from Appendices E-1 and E-2, and the Tribe is on the list to receive all public notices and circulated document for the Project.

A-6.2 This comment is introductory and asks that the Tribe be added to the distribution lists for public notices and circulated documents. The Tribe is on the list to receive all public notices and circulated document for the Project.

A-6.3 This comment requests that the Phase II testing plan be completed. The Phase II testing and evaluation program has been completed and was done in consultation with both the Pechanga and Soboba Bands and is included as Appendix E-1 of the Final EIR. Consultation between representatives from March JPA, the Soboba Band of Luiseño Indians, and the Pechanga Band of Indians resulted in an agreement regarding the scope and methods for the Archaeological Test Plan (ATP), which were approved by March JPA in March 2023. Archaeological testing in compliance with the ATP occurred between March 20, 2023 and March 31, 2023. The archaeological testing and evaluation within the Area of Potential Effect (APE) included sites CA-RIV-4067, CA-RIV-5420, Temp-2, Temp-3, and Temp-9 to Temp-15. While Site CA-RIV-5420 contains features both within and outside of the APE, testing at this location primarily focused on those within the APE. Due to their proximity to the APE, the areas of sites CA-RIV-5811, CA-RIV-5812, and CA-RIV-5819 containing milling features were marked and not tested to ensure all milling features would not be impacted by the Project. Testing at these sites was instead conducted within adjacent areas, primarily within the APE, to confirm that the site boundaries do not extend into the APE. At the request of the consulting tribes, seven additional exploratory shovel test pits (STPs) were excavated within the APE at locations of their choosing. In total, 75 STPs were excavated, and no archaeological material was identified.

No testing occurred at CA-RIV-5421 since the site was previously tested and evaluated as not eligible for the National Register of Historic Places (NRHP) by McDonald and Giacomini in 1996. Testing was also not conducted at CA-RIV-4068 since the site is clearly outside of the APE; however, this has been included in the study at the request of March JPA and the consulting tribes.

Based upon the records search, surveys, and testing program, sites CA-RIV-4067, CA-RIV-5420, CA-RIV-5421, Temp-2, Temp-3, and Temp-9 to Temp-15 are not eligible for the California Register of Historical Resources (CRHR) or the NRHP. Sites CA-RIV-4068, CA-RIV-5811, CA-RIV-5812, and CA-RIV-5819 were not evaluated for significance as they were found to have no elements within the APE.

The Phase II archeological technical document, included as Appendix E-1 of the Final EIR, presents revised conditions, which were formulated based upon input by the Pechanga Band and consultation between the tribes, March JPA, and the Applicant. These conditions will be incorporated into a Mitigation Monitoring and Reporting Program (MMRP) as mitigation measures. These mitigation measures primarily consist of efforts to either preserve in place or relocate (move) bedrock milling

features, monitoring of ground-disturbing activities by an archaeologist and Native American observer, and controlled grading within the vicinity of any recorded site to ensure the timely and proper handling of any inadvertent finds. The revised mitigation measures are discussed in Response A-6.12, below.

A-6.4 This comment requests that all ethnographic information and references to the Gabrielino be removed from the Draft EIR. The detailed discussion of the Gabrielino has been removed from the Phase II archaeological technical study as well as the Final EIR.

A-6.5 This comment requests consultation, as required by CEQA. March JPA has consulted with the Pechanga Band in accordance with all applicable laws and regulations.

A-6.6 This comment notes that Pechanga is culturally affiliated to the geographic area in which the Project site is located. This information is noted and as explained by the Pechanga Band, it is recognized that they were designated as the affiliated tribe by LSA Associates, Inc. for March JPA and MARB. March JPA has consulted with the Pechanga Band in accordance with all applicable laws and regulations.

A-6.7 This comment expresses concern about both the protection of unique and irreplaceable cultural resources and the proper and lawful treatment of cultural items. In response, please see Response A-6.3 above. The Phase II testing and evaluation program has been completed in consultation with both the Pechanga and Soboba Bands. No CRHR-eligible sites are located within the development area. However, to protect against any potential impacts to previously undefined or unanticipated resources, the measures of the MMRP regarding cultural and tribal cultural resources have been developed through consultation with the Pechanga and Soboba Bands. The revised mitigation measures are discussed in Response A-6.12, below.

A-6.8 This comment requests the removal of sensitive information provided in Appendices E-1 and E-2 of the Draft EIR. The sensitive information has been removed from Appendices E-1 and E-2. This information should not be made available for public review and the March JPA website no longer makes the information publicly available.

A-6.9 This comment requests the completion of the archaeological Phase II testing plan. Please see Response A-6.3 above; the archaeological Phase II testing plan has been completed and is included as Appendix E-1 of the Final EIR. The revised mitigation measures are discussed in Response A-6.12, below.

A-6.10 This comment requests that Section 4.16, Tribal Cultural Resources, be modified to replace all of Section 4.16.1, Existing Conditions, with a summary. Section 4.16.1 of the Final EIR has been revised as requested.

A-6.11 This comment provides clarification information about the people of Pechanga. The Phase II technical study, included as Appendix E-1 of the Final EIR, continues to detail the accepted archaeological data, which includes appropriate citations from accepted scientific literature (see section 3.2.5 “Protohistoric Period [Late Holocene: circa 1542 to circa 1769]” of the Phase II technical study). However, the document has always maintained there is a difference in view between the archaeological perspective and the Native American community regarding origin (see section 3.2 “Cultural Setting – Archaeological Perspectives”).

Although the Phase II technical study does discuss the "Takic expansion," it does not reference the "Shoshonean Wedge," nor does it state that the "Luiseño had no word for their nationality." However, information presented by the tribe above has been incorporated into the technical study.

The information referencing "'Atáaxum, which means 'people,' and traditional songs refer to the people as Payómkawichum, 'people of the west'" has been added to the technical report. In addition, the Pechanga Band's information that "the world was created in this the area now known as Temecula …" has also been included with the existing, the archaeological data, which discusses the Luiseño's presence in southern California prior to the Takic expansion. The technical study, included as Appendix E-1 of the Final EIR, has always noted that the Luiseño were likely not a Takic group expanding into the territory, but "rather a northern San Diego County/southern Riverside County Yuman population who adopted the Takic language" (see section 3.2.4 "Late Prehistoric Period [Late Holocene: 1,300 YBP to 1790]" of the Phase II technical study).

A-6.12 This comment outlines requested revisions to mitigation measures included within the Draft EIR. March JPA has since further collaborated with the consulting tribes on the draft mitigation measures, as the Phase II testing was monitored by the consulting tribes and is now complete. With the completion of the Project Phase II technical study (Appendix E-1), original MM-CUL-1, which required the preparation of an archaeological testing plan, has been removed and the remaining mitigation measures have been renumbered. In response to this comment and Response A-6.3, above, the mitigation measures within Section 4.16, Tribal Cultural Resources, of the Final EIR are revised to reflect what was agreed upon by the tribe and March JPA.

A-6.13 This comment is a concluding statement and does not raise any issues or concerns with the adequacy of the environmental analysis included within the Draft EIR. As such, no further response is provided.

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Comment Letter A-7

From: Tsang, Kevin <KTSANG@RIVCO.ORG>
Sent: Thursday, March 9, 2023 3:41 PM
To: Dan Fairbanks
Cc: Williams, Russell; Ketcham, Thomas; Hildebrand, John
Subject: March JPA: West Campus Upper Plateau DEIR
Attachments: Pages from Pages from Draft-West-Campus-Upper-Plateau-Project-Environmental-Impact-Report-compressed_Eva Comments - kkt.pdf

Hello Dan,

Thank you for the opportunity to review the Draft EIR for the West Campus Upper Plateau project. The following are comments I have on the DEIR:

Truck Routes
On page 4.15-2, the DEIR reads:

> *Truck routes are proposed along Cactus Avenue to I-215, as well as along Linebacker Drive, Arclight Drive, Airman Drive, and Bunker Hill Drive (see Figure 3-6, Proposed Truck Routes), all of which would connect to existing truck routes along Alessandro Boulevard, Meridian Parkway, and Cactus Avenue (east of Meridian Parkway). As shown in Figure 3-6, trucks from the Specific Plan Area would be prohibited along the Barton Street extension. Trucks would also be prohibited from turning left on Brown Street to access Alessandro Boulevard.*

Will there project provide any physical improvements to restrict trucks from accessing Alessandro Blvd. and travel west? If yes, can you provide a copy of the conditions of approval that will requires its implementation? A-7.1

Will March JPA be implementing any policies and/or other regulations to ensure trucks utilize established truck routes and obey weight limited roadways? A-7.2

Brown Street
On page 4.15-19, the DEIR indicates under the Brown Street heading:

> *Construct Brown Street at its ultimate full-section width as an Industrial Collector (78-foot right-of-way, 56-foot curb-to-curb) between the existing northerly terminus and Cactus Avenue.*

The March JPA General Plan designates Brown Street (Plummer Street) as a 4-lane Major Arterial. The text in the DEIR indicates the ultimate section for Brown Street is a 2-lane Industrial Collector? Will the reduction in travel lanes be sufficient to accommodate the traffic at buildout of the March JPA General Plan? Is there a General Plan Amendment associated with the change in roadway classification? A-7.3

Truck Enforcement Program
On page 4.15-19, under PDF-TRA-3 the DEIR reads:

> *To address trucks turning left from Cactus Avenue onto Brown Street or otherwise violating the established truck routes, the Project applicant shall provide the March Joint Powers Authority compensation of $100,000 to fund a truck route enforcement for a period of two years.*

How are these funds utilized to conduct enforcement? Is Riverside PD, Sheriff, and CHP involved with he enforcement of truck routes? What will occur after the two-year period? A-7.4

General Plan Consistency
On page 4.15-26, the DEIR discusses the project's consistency with the March JPA General Plan. As mentioned above in the comments regarding Brown Street, the ultimate cross-section for Brown Street discussed in the DEIR appears to be inconsistent with the March JPA General Plan. I have attached Figures 4.15-2 and 4.15-3 to illustrate.

A-7.5

Please let me know if you have questions or would like to discuss the comments above.

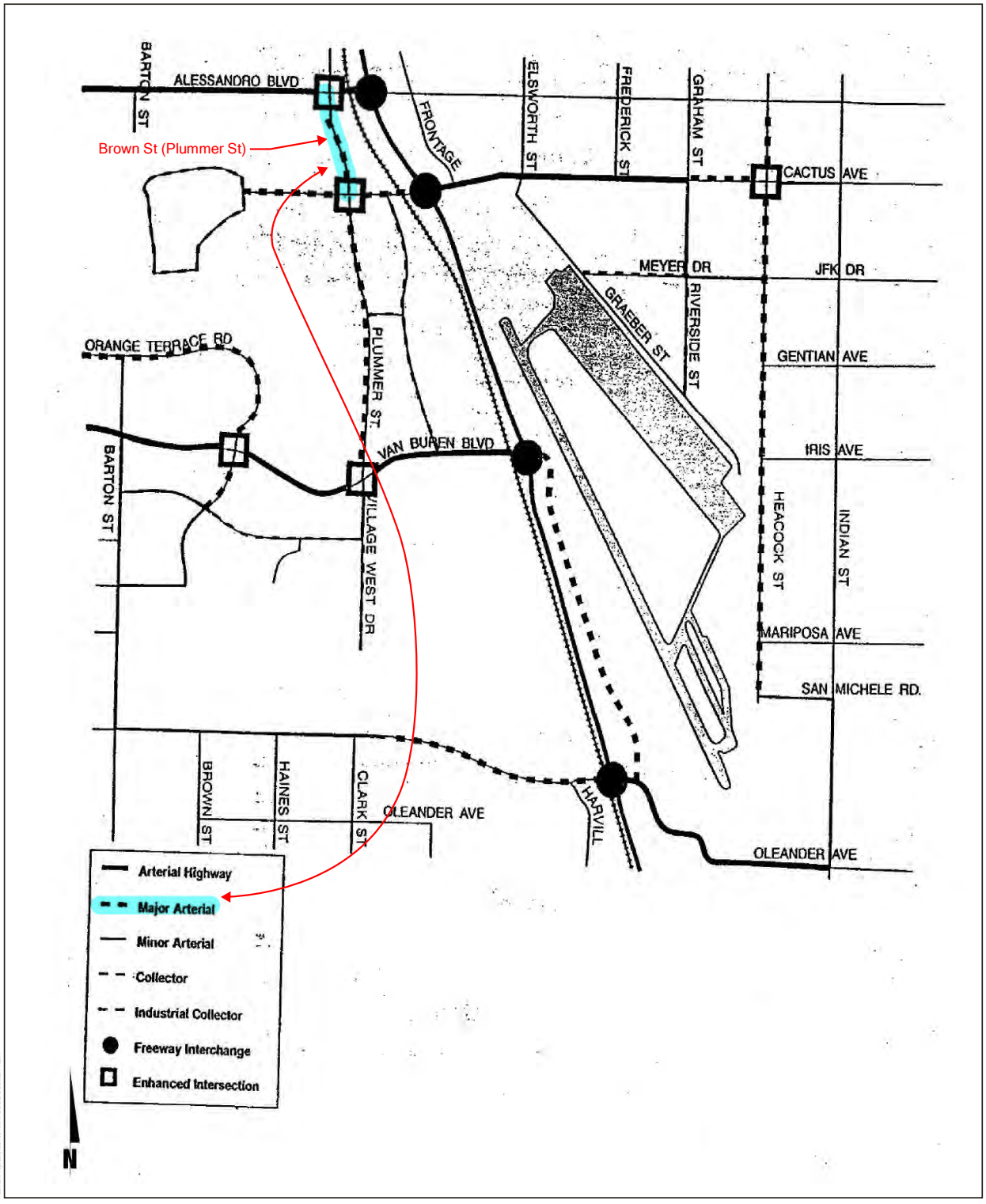
Thanks,

Kevin Tsang, P.E.
Riverside County, TLMA
Transportation Department
4080 Lemon Street, 8th Floor
Riverside, CA 92501
Tel: (951) 955-6828
Fax: (951) 955-0049
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County of Riverside California



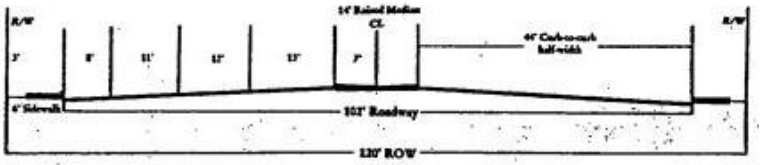
SOURCE: Urban Crossroads 2022

FIGURE 4.15-2

March JPA General Plan Circulation Element Roadway Classification

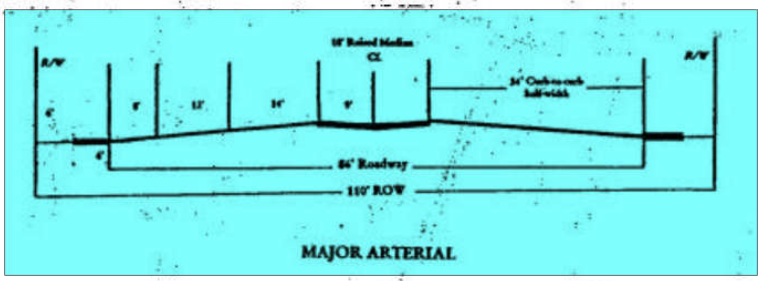
West Campus Upper Plateau EIR

DUDEK

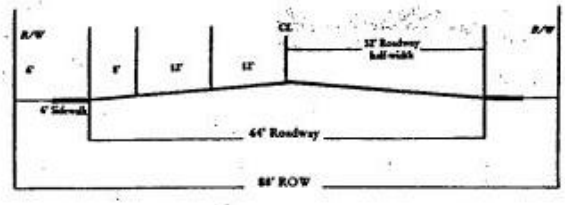


ARTERIAL HIGHWAY

Brown St per MJPA General Plan

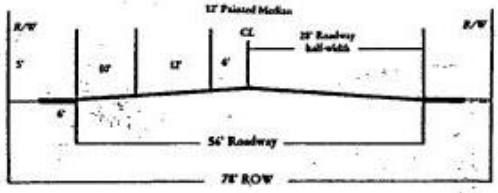


MAJOR ARTERIAL

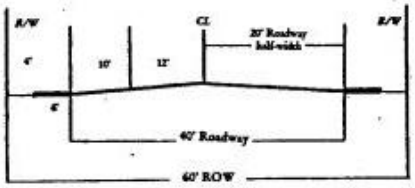


MINOR ARTERIAL

Brown St per West Campus Upper Plateau



INDUSTRIAL COLLECTOR



LOCAL STREET

SOURCE: Urban Crossroads 2022

FIGURE 4.15-3

March JPA General Plan Roadway Cross-Sections

West Campus Upper Plateau EIR

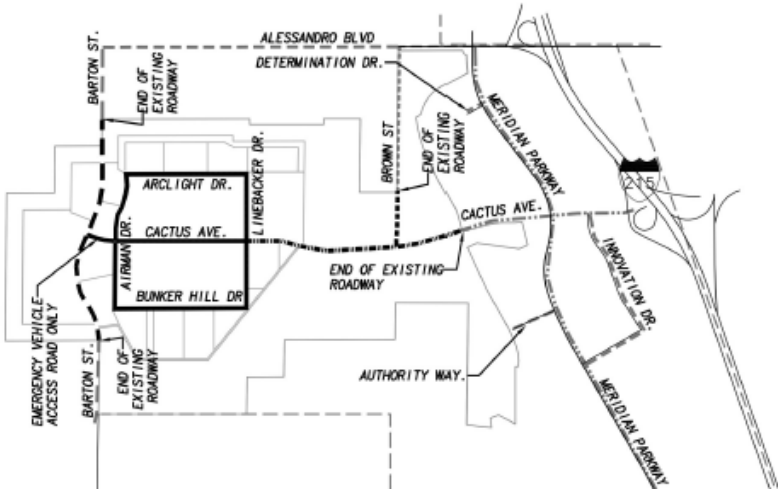
DUDEK

Letter A-7

Riverside County Transportation and Land Management Agency
March 9, 2023

A-7.1 This comment questions whether the Project will include any physical improvements to restrict trucks from accessing Alessandro Blvd. and traveling west. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. The parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway. See Figure A-7.1-1, below.

Figure A-7.1-1 Proposed Project Circulation Plan



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

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



Section 4.15, Transportation, of the Draft EIR states "Currently, trucks cannot turn left from northbound Brown Street to access Alessandro Boulevard due to existing channelization that has been installed. Similar channelization and/or signage will be installed on Cactus Avenue to prevent trucks from turning left onto Brown Street. Therefore, trucks leaving the Campus Development would travel to Meridian Parkway and would not use Brown Street." The text of the EIR has been modified to clarify that signage is present indicating that trucks cannot turn left from northbound Brown Street to access Alessandro Boulevard.

PDF-TRA-1 identifies on-site and site adjacent roadway improvements that will be constructed to accommodate site access. In response to this comment regarding the eastbound approach to the intersection of Brown Street and Cactus Avenue, PDF-TRA-1 has been revised to reflect that the roadway would be channelized or otherwise signed to prevent trucks from turning left onto Brown Street.

PDF-TRA-2 describes the proposed revisions to the existing March JPA truck routes. In response to this comment, PDF-TRA-2 was revised to identify that trucks are prohibited from turning left on Brown Street to access Alessandro Boulevard.

Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. There are no anticipated traffic hazards or other traffic impacts due to the implementation of channelization or signage preventing trucks traveling east on Cactus Avenue from turning left onto Brown Street. As has been the practice with all March JPA Truck Route Ordinance amendments, March JPA will consult with the County of Riverside and City of Riverside to assure that the updated truck route ordinance meets the mutual needs of Riverside County, City of Riverside and March JPA. Additionally, Figure 3-6, Proposed Truck Routes, was revised in Recirculated Chapter 3.0, Project Description, to show no left turn from Cactus Avenue onto Brown Street.

The revisions to the EIR in response to this comment do not modify any of the analysis or change any conclusions in the EIR and do not add any new significant impacts.

A-7.2 This comment questions what policies March JPA will implement to enforce truck routes and weight limits. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Under PDF-TRA-1, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid for through an existing truck mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval

and included in the MMRP. March JPA will monitor compliance through the MMRP. No changes or revisions to the EIR are required in response to this comment.

A-7.3 This comment questions the General Plan redesignation of Brown Street from a 4-lane Major Arterial to a 2-lane Industrial Collector. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), Exhibit 2-1, Transportation Plan, of the March JPA General Plan currently designates Brown Street as a Major Arterial and shows Brown Street/Plummer Street as a through road between Alessandro Boulevard to the north and Van Buren Boulevard to the south. As explained in Recirculated Chapter 3, Project Description, in 2014, March JPA placed approximately 141 acres located north of Van Buren Boulevard under a conservation easement currently managed by the Rivers and Lands Conservancy. The Project proposes to place 445.43 acres surrounding the Specific Plan Area under a similar conservation easement. As such, Brown Street could not be extended south of Cactus Avenue without impacting, and likely violating, the existing and proposed conservation easements. As explained in Recirculated Chapter 3, Project Description, the Project's requested entitlements include amending Exhibit 2-1, Transportation Plan, of the March JPA General Plan to identify the Project's proposed revisions to the March JPA circulation network, including revisions to the roadway designations.

In the configuration proposed by the Project, Brown Street will serve already existing development to the west and abut the Conservation Easement to the east. Aside from the Specific Plan Area, there is no further undeveloped/unentitled land within March JPA jurisdiction that would impact Brown Street capacity. The Project Traffic Analysis (Appendix N-2) analyzed Project traffic and cumulative traffic. The pass-by volumes have been corrected in the traffic study to include the correct pass-by ADT volumes. As such, the ADT volumes have been updated for the following study area roadway segments for all With Project scenarios:

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

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

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

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

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

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

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

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

No changes or revisions to the EIR are required in response to this comment.

A-7.4 This comment questions how funds collected through PDF-TRA-3 will be used to enforce truck routes and what will happened after two years. See Response A-7.2, above, regarding the truck route enforcement and the funding provided through PDF-TRA-3.

A-7.5 This comment questions the Project's consistency with the General Plan with regard to Brown Street. See Response A-7.3, above, regarding the roadway designation for Brown Street.

Comment Letter A-8

From: Danica Nguyen <dnguyen1@aqmd.gov>
Sent: Thursday, March 9, 2023 10:41 AM
To: Dan Fairbanks
Cc: Sam Wang
Subject: South Coast AQMD Staff's Comments on the Draft EIR for the West Campus Upper Plateau Project
Attachments: RVC230111-04 DEIR West Campus Upper Plateau Project.pdf

Dear Mr. Fairbanks,

Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report (Draft EIR) for the Proposed West Campus Upper Plateau Project (SCH No.: 2021110304) (South Coast AQMD Control Number: RVC230111-04). Please contact me if you have any questions regarding these comments. A-8.1

Regards,

Danica Nguyen
Air Quality Specialist, CEQA-IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Phone: (909) 396-3531
E-mail: dnguyen1@aqmd.gov
Please note South Coast AQMD is closed on Mondays.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
fairbanks@marchjpa.com
Dan Fairbanks, Planning Director
March Joint Power Authority
14205 Meridian Parkway, Suite 140
Riverside, California 92518

March 9, 2023

Draft Environmental Impact Report (Draft EIR) for the Proposed West Campus Upper Plateau Project (Proposed Project) (SCH Number: 2021110304)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The March Joint Power Authority is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments recommended revision to the health risk assessment, California Emissions Estimator Model (CalEEMod) analysis, greenhouse gas emissions analysis, additional air quality mitigation measures, and South Coast AQMD Permits and Responsible Agency the Lead Agency should include in the Final EIR.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of the Specific Plan Area and Conservative Easement that comprise approximately 818 acres within the March Joint Power Authority (JPA) planning area.[1] The project components of the Proposed Project consist of a) Specific Plan Area includes business park, industrial, mixed-use, public facility, parks, recreation and open space, and infrastructure improvements, totaling 369.60 acres;[2] b) Conservative Easement includes open space, which totals of 445.43 acres.[3] There is an existing Eastern Municipal Water District Water Tank within the Proposed Project site comprises 2.87 acres.[4]

Under the Specific Plan Area component of the Proposed Project, the Draft EIR assumes the following buildout for the analysis[5]:

- Building B – 1,250,000 square feet of high-cube fulfillment center warehouse use
- Building C – 587,000 square feet of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 square feet of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 square feet of high-cube cold storage warehouse use
- Business Park Area – 1,280,403 square feet of business park use (assume 75% warehouse use and 25% office and non-warehouse use[6])

A-8.2

[1] Draft EIR. Page 3-1.
[2] *Ibid*. Page 1-4.
[3] *Ibid*.
[4] *Ibid*.
[5] *Ibid*. Page 1-4 and 1-5.
[6] *Ibid*. Page 3-9.

- Mixed Use Area – 160,921 square feet of retail use (25%)
- Mixed Use Area – 482,765 square feet of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facility – 2.84 acres for future sewer lift station and electrical substation (within the Specific Plan Area)

Since the Proposed Project includes 500,000 square feet of cold storage warehouse, trucks associated with the cold storage warehouse are assumed to have transport refrigeration units (TRUs) and are estimated as 188 trucks (376 two-way truck trips per day).[7] The Proposed Project Trip Generation would have a total of 2,504 trucks trip per day.[8]

A-8.2 Cont.

The Proposed Project is in the western portion of the March JPA planning area, west of Cactus Avenue's current terminus, east and south of the Mission Grove neighborhood, and north of the Orangecrest neighborhood in the City of Riverside.[9] Based on the aerial photographs, South Coast AQMD staff finds that the nearest sensitive receptors (e.g., residences) are adjacent to the north, south, and west of the Proposed Project boundaries. The Proposed Project's construction is estimated to begin in June 2023 and last approximately 4.5 years.[10] The proposed Project would be fully occupied and operational in Fall 2027.[11]

South Coast AQMD Staff's Comments on the Draft EIR

Health Risk Assessment (HRA) Analysis

Averaging Time Utilized in Construction and Operational HRA Analysis

Based on the construction and operational HRA output files, the averaging time for the analysis is ANNUAL. [12] However, according to the South Coast AQMD Risk Assessment Procedures v8.1, the detailed HRA utilizing AERMOD should be run using the averaging time PERIOD and 1-hour.[13] Since the construction and operational HRAs of the Proposed Project using ANNUAL, South Coast AQMD staff recommend that the Lead Agency re-run the construction and operational HRAs utilizing PERIOD and 1-hour averaging time to determine the health risk impacts to the sensitive receptors and off-site workers and include the revised results in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

A-8.3

Building Downwash Option in Operational HRA

Based on the South Coast AQMD staff review, the HRA modeling file does not include the building downwash option in the operational HRA. The ground-level pollutant concentrations near the building would be underestimated if the downwash effects were absent in the dispersion

A-8.4

[7] *Ibid*. Page 4.2-24.
[8] *Ibid*. Page 4.15-7.
[9] *Ibid*. Page 3-1.
[10] *Ibid*. Page 3-19.
[11] *Ibid*.
[12] *Ibid*. Appendix A – Mobile Source Health Risk Assessment. Pages 73 and 245 of PDF.
[13] South Coast AQMD Risk Assessment Procedures v8.1. Access at: http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf

modeling. Therefore, building downwash should be considered for the Proposed Project operation in order to predict more accurate ground-level concentrations. In addition, the truck idling emissions would need to be estimated separately and included in the dispersion modeling analysis and HRA as point sources. However, the operational HRA modeling file indicates those emissions as line volume source types. Thus, truck idling emissions should be modeled as point sources with a building downwash option selected. In addition, it needs to be clarified in the Draft EIR if the stationary combustion engines (e.g., diesel firewater pump, diesel emergency generator, etc.) will be used on-site during operation. If any of these will be used when implementing the Proposed Project, they will need to be added as additional sources to the HRA and dispersion modeling files. Therefore, South Coast AQMD staff recommend that the Lead Agency revise the operational HRA modeling by incorporating the above recommendations and including the HRA results in the Final EIR. If the HRA modeling is not revised and included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

A-8.4 Cont.

California Emissions Estimator Model (CalEEMod) Analysis

The Lead Agency utilizes California Emissions Estimator Model (CalEEMod) version 2022.1 to calculate the Proposed project's emissions from construction and operational activities and includes the CalEEMod output files in Appendix C-1: Air Quality Technical Report.[14] South Coast AQMD staff has the following concerns regarding the CalEEMod output files and recommends that the Lead Agency review and revise the CalEEMod analysis and include the revision in the Final EIR.

User-Defined Land Use Subtype and Truck Fleet Mix

In the operational CalEEMod output files, besides the "unrefrigerated warehouse-no rail" and "refrigerated warehouse-no rail" land use types, "user-defined industrial" is added.[15] According to the CalEEMod User Guide, the "user-defined" may be selected to characterize project land use subtypes that are not included in CalEEMod. If selected, all data on the Land Use screen will need to be input manually. [16] However, the size metric, lot acreage, and the floor square area use are all set to zero under the "user-defined industrial" land use subtype.

A-8.5

In addition, the truck fleet mix is input under the "user-defined industrial" but not in the "unrefrigerated warehouse-no rail" and "refrigerated warehouse-no rail" land use. This possibly leads to underestimating the heavy-duty truck emissions for warehouse activities since no data is filled under this "user-defined industrial" land use subtype.

Therefore, South Coast AQMD staff recommends that the Lead Agency explain why the land use is separated in the CalEEMod analysis; why the fleet mix is not under the "unrefrigerated warehouse-no rail" and "refrigerated warehouse-no rail" land use and include the explanation in the Final EIR. If the explanation is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

[14] *Ibid*. Appendix C-1: Air Quality Technical Report.
[15] *Ibid*. Appendix C-1: Air Quality Technical Report. Page 223 of PDF.
[16] California Emissions Estimator Model (CalEEMod) Version 2022.1 User Guide. Access at: https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf

Trip Generations

Appendix N – Transportation of the Draft EIR discusses the Proposed Project trip generation and includes the summary in Table 4-2 of the Project Total Trips of 35,314 daily, in which 2,054 trucks trips per day.[17] Although the Project Total Trips from Appendix N match with Appendix C-1 CalEEMod output files,[18] the trip numbers under each land use type are different from Appendix N, an example is shown in Table A to demonstrate the difference.

Table A
Example of the Difference in Trip Numbers between Appendix N and Appendix C-1

Land Use Type	Appendix N – Transportation	Appendix C-1: Air Quality Technical Report – CalEEMod Output Files
Refrigerated Warehouse-No Rail	1,062 trips/weekday	669 trips/weekday

Due to the differences, South Coast AQMD staff recommends that the Lead Agency explain the differences and/or revise Appendix N and Appendix C-1 to present consistent values to avoid discrepancies throughout the documents and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

A-8.6

Greenhouse Gas Emissions Analysis

Based on the Draft EIR, the Proposed Project's greenhouse gas (GHG) emissions are calculated using CalEEMod lasted version (v2022.1).[19] The amortized annual construction emissions and Proposed Project GHG emissions prior to mitigations are shown in Tables 4.7-6 and 4.7-7.[20] To reduce GHG emissions, the Lead Agency proposes MM-GHG-1 to MM-GHG-11[21] and concludes that the Proposed Project's GHG emissions would be less than significant with mitigation incorporated.[22] Table 4.7-8 shows the mitigated Proposed Project's total CO_2e emissions of 91,010.58 metric tons per year (MT/yr CO_2e).[23] However, South Coast AQMD staff has concerns about the conclusion of "*less than significant with mitigation incorporated"* since the Proposed Project's total GHG emissions with mitigation are greater than the GHG CEQA significance thresholds of 10,000 MT/yr CO_2e.[24] Thus, South Coast AQMD staff recommends that the Lead Agency provide an explanation of how the "*less than significant with mitigation incorporated"* conclusion is determined in the Final EIR. In the event that the "*less than significant with mitigation incorporated"* conclusion is incorrect, it's recommended that the Lead Agency revise the GHG emissions section with the correct determination and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

A-8.7

[17] *Ibid*. Page 63.
[18] *Ibid*. Appendix C-1: Air Quality Technical Report. Page 267 of PDF.
[19] *Ibid*. Page 4.7-28.
[20] *Ibid*. Page 4.7-40.
[21] *Ibid*. Page 4.7-41 to 4.7-42.
[22] *Ibid*. Page 4.7-42.
[23] *Ibid*.
[24] South Coast AQMD CEQA Significance Thresholds. Access at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf

Additionally, the Draft EIR discusses the cumulative effects conclusion under the GHG section and indicates the result as "*less than cumulatively considerable*."[25] As mentioned in the above comment, the GHG emissions would be significant and unavoidable after incorporated mitigation due to the exceedance in the CEQA significance thresholds of 10,000 $MTCO_2e$/year; thus, the conclusion for the cumulative effects should be addressed as cumulatively considerable and not as less than cumulative considerable. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the cumulative effects discussion under the GHG section and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

A-8.7 Cont.

Additional Air Quality and Greenhouse Gas Mitigation Measures

According to the Draft EIR, the maximum daily emissions from the Proposed Project are significant (VOC for construction[26] and VOC, NOx, CO, and PM10 for operation[27]) prior to mitigations. To reduce the emissions from construction and operational activities, the Lead Agency proposes mitigation measures from MM AQ-1 to MM AQ-15[28] and project design features PDF-AQ-1 to PDF-AQ-11.[29] Similarly, the Lead Agency proposes MM-GHG-1 to MM-GHG-11[30] and PDF-GHG-1[31] to reduce the Proposed Project's GHG emissions in the Draft EIR.

The South Coast AQMD staff strongly encourages the Lead Agency to review the below references and consider including the additional recommended mitigation measures in the Final EIR.

A-8.8

- State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[32]
- South Coast AQMD 2022 South Coast Air Quality Management Plan,[33] specifically:
    - Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures
    - Appendix IV-B – CARB's Strategy for South Coast
    - Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measures
- United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation[34]

[25] *Ibid*. Page 4.7-43.
[26] *Ibid*. Page 4.2-27.
[27] *Ibid*. Page 4.2-28.
[28] *Ibid*. Page 4.2-25 to 4.2-38.
[29] *Ibid*. Page 4.2-15.
[30] *Ibid*. Page 4.7-41 to 4.7-42.
[31] *Ibid*. Page 4.7-27.
[32] State of California – Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Access at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
[33] 2022 South Coast AQMP. Access at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan
[34] United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation. Access at: https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary equipment, including but not limited to emergency generators, fire water pumps, boilers, etc., permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. A-8.9

Conclusion

Pursuant to California Public Resources Code section 21092.5(a) and CEQA Guidelines section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein, at least ten days prior to the certification of the Final EIR.[35] In addition, when the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines §15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and to the public who are interested in the Proposed Project. A-8.10

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA-IGR
Planning, Rule Development & Implementation

SW:DN
RVC230111-04
Control Number

[35] 2022 CEQA Statues and Guidelines Section 21092.5(a): "At least 10 days prior to certifying an environmental impact report, the lead agency shall provide a written proposed response to a public agency on comments made by that agency which conform with the requirements of this division. Proposed responses shall conform with the legal standards established for responses to comments on draft environmental impact reports. Copies of responses or the environmental document in which they are contained, prepared in conformance with other requirements of this division and the guidelines adopted pursuant to Section 21083, may be used to meet the requirements imposed by this section."
Access at: https://www.califaep.org/docs/2022_CEQA_Statue_and_Guidelines.pdf.

Letter A-8

South Coast Air Quality Management District
March 9, 2023

A-8.1 This comment is an email transmittal of the comment letter. Specific comments regarding the Draft EIR are provided and responded to below.

A-8.2 This comment is introductory in nature and summarizes Project information from the Draft EIR. To clarify with respect to what appear to be a couple of typographical errors in the comment, the Project includes a Conservation Easement, and the estimated truck trip generation is 2,054 trucks per day per Table 4.15-1, Project Trip Generation Summary, of the Draft EIR. Specific comments regarding the Draft EIR are provided and responded to below.

A-8.3 This comment states that the analysis should have been run in AERMOD utilizing the PERIOD and 1-Hour averaging time options as opposed to the ANNUAL averaging time option. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), the PERIOD and ANNUAL options return identical results. The PERIOD averaging time option averages pollutant concentrations over the entire period of meteorological data, whereas the ANNUAL averaging time option averages pollutant concentrations over one year. However, per the AERMOD user guide, when multi-year meteorological data sets are used, the ANNUAL option outputs the average of the ANNUAL values across the years of data processed. Since the meteorological data set used for this Project includes five years of data, when the ANNUAL option is selected, the model outputs the average concentration for the entire data set, the same as would be output using the PERIOD option. In response to this comment, the model was re-run for both construction and operational health risks utilizing the PERIOD averaging time option, which resulted in identical pollutant concentrations as the previous output which had utilized the ANNUAL averaging time option. The revised model outputs provided in Appendix C-4 of this Final EIR demonstrate that the PERIOD and ANNUAL averaging time options result in identical pollutant concentrations. (Appendix C-4)

Additionally, the 1-Hour averaging time option is not required since there are no 1-hour acute standards associated with diesel particulate matter (DPM) and providing a 1-hour concentration would not produce meaningful information that could be compared against any adopted standard or threshold (since none exists for a 1-hour DPM concentration). As such, since the only toxic air contaminant (TAC) emitted by the proposed Project is DPM, which does not have an acute REL (meaning there are no expected acute health impacts), the 1 hour averaging time option is not necessary for acute cancer health risks associated with TAC emissions from diesel particulate matter. (Appendix C-4 of the Final EIR)

A-8.4 This comment states that the analysis should have been performed utilizing the building downwash option in order to account for any impacts buildings may have on ground level concentrations, and that pollutant concentrations near the building may be underestimated without inclusion of building downwash in the modeling. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4), per the AERMOD Users Guide, the building downwash algorithms do not apply to volume sources (including line volume sources). Furthermore, consistent with the SCAQMD's Risk Assessment Procedures Version 8.1 Appendix X (page X-3), the building downwash algorithm only applies to point sources and does not affect volume sources: "The building downwash algorithms only affect point sources and do not affect volume or area sources." The Project's DPM emissions come from trucks

and as explained below, are properly modeled as line volume sources. Therefore, the building downwash algorithms do not apply and the inclusion of building downwash in the analysis would not impact ground level concentrations, or pollutant concentrations near the buildings.

Additionally, the comment states that truck idling emissions should be modeled using point sources rather than line volume sources. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), the use of the volume source algorithm in AERMOD to represent truck idling, instead of the point source algorithm, is justified based on several factors:

1. Nature of Emissions: Truck idling emissions are characterized by a diffused and dispersed emission pattern rather than a concentrated point source. Idling emissions occur over a larger area, typically surrounding the truck, rather than originating from a single point. The volume source algorithm is better suited to represent such diffuse emissions as it distributes the emissions over a specified volume, resulting in a more realistic representation.
2. Dispersion Characteristics: The dispersion characteristics of idling emissions are different from those of point source emissions. Point sources generally have a well-defined and predictable plume behavior, whereas idling emissions tend to disperse more quickly and unevenly due to factors like wind conditions, vehicle movements, and local topography. The volume source algorithm accounts for the dispersion of emissions in a more accurate and realistic manner, considering the complex interactions with the surrounding environment.
3. Modeling Accuracy: The volume source algorithm provides more accurate modeling results for truck idling emissions compared to the point source algorithm. By distributing emissions across a volume, it allows for better representation of the spatial distribution and concentration of pollutants. This increased accuracy is particularly important when assessing the impact of idling emissions on air quality in areas with complex geometries or near sensitive receptors.

It is important to note that the choice between the volume source algorithm and the point source algorithm is based on the specific characteristics of the emission source and the modeling objectives. In some cases, such as for point sources with well-defined plumes (such as smoke stacks), the point source algorithm may be more appropriate. However, for representing truck idling emissions like those associated with this Project, the volume source algorithm is a better option due to its ability to capture the diffuse and dispersed nature of these emissions. (Appendix C-4 of the Final EIR)

The comment also requests clarification as to whether stationary combustion engines will be used on-site during operation. As explained in the Recirculated Section 4.2, Air Quality, no stationary combustion engines such as emergency generators or fire pumps are proposed as part of the Project. Further, MM-AQ-24 was added to prohibit the use of diesel back-up generators. For analysis purposes, however, Recirculated Section 4.2, Air Quality, conservatively assumed the installation of nineteen 300-horsepower diesel-powered generators, operating up to one hour per day, one day per week, for up to 50 hours per year for maintenance and testing purposes. Under mitigated conditions, the Project was assumed to utilize Tier 4 generators.

South Coast AQMD staff reviewed the recirculated Project AQIA and Project HRA and did not provide further comment on this issue in its letter dated February 23, 2024.

A-8.5 This comment questions the user-defined land use subtype and truck fleet mix. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), the user-defined industrial land use was modeled in CalEEMod in order to separate passenger car and truck vehicle trips. The land use is separated in the CalEEMod analysis into "user defined industrial" and "user defined commercial" land uses to account for emissions resulting from truck trips only and allows the truck trip lengths associated with industrial and commercial uses to be adjusted consistent with SCAQMD guidance. For example, the truck trip length for trucks associated with the industrial and commercial portion was estimated to be 32.03 miles as explained in the Air Quality Impact Analysis (Appendix C-1) and Recirculated Section 4.2, Air Quality. This truck trip length and truck trips input in CalEEMod were derived based on the weighted average fleet mix of trucks by land use as summarized on Table 5-7 in Appendix C-1. As such, the number of truck trips input into CalEEMod are based on the truck trips and the weighted fleet mix as calculated in the traffic analysis for the Project. Therefore, emissions are appropriately calculated for each truck class by the percentage weight identified in the analysis. An excerpt of Table 5-7 from Appendix C-1 is provided below and shows the weighted average of truck by classification for all land uses:

TABLE 5-7: TRUCK FLEET MIX

Land Use	% Vehicle Type			
	LHDT1	LHDT2	MHDT	HHDT
Building B: High-Cube Fulfillment Center	68.66%	13.32%	3.81%	14.21%
Building C: High-Cube Fulfillment Center				
High-Cube Cold Storage Use				
Remaining Industrial: High-Cube Fulfillment Center				
Business Park				
Business Park (Mixed-Use, 75%)				

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT1, LHDT2, MHDT, and HHDT) relative to the total number of truck trips.

Passenger car trips as well as area, energy, water, and waste emissions were modeled under the unrefrigerated and refrigerated warehouse land use types and are based on the trips calculated in the traffic analysis for the Project. As such, inputting non-zero values for acreage, building square footage, and landscape area in the user defined land uses would result in a double counting of emissions from area, energy, water, waste, and refrigerants. (Appendix C-4)

A-8.6 This comment states that the total Project trips that were modeled in CalEEMod may not match those presented in the transportation section of the Draft EIR. As explained above in Response A-8.5 and the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), passenger car and truck trips were separated based on land use, with passenger car trips being modeled under the unrefrigerated and refrigerated warehouse, Office Park, Regional Shopping Center and City Park land uses; and truck trips being modeled using the user-defined industrial and commercial land uses. As shown on Table 4.15-1 of the Draft EIR, a total of 5,172 passenger car trips are attributed to the industrial warehouse uses of the Project. Accounting for internal capture, this is reduced to 5,042 passenger car trips per day, which matches the number of trips modeled in CalEEMod for the unrefrigerated and refrigerated warehouse uses.

The user-defined industrial land use in CalEEMod was utilized for modeling a total of 1,351 daily truck trips from the industrial land uses and 705 trucks from the commercial (business park) land uses. This value matches the total number of truck trips presented in Appendix N-2 of the EIR for the combined industrial and commercial land uses. (Appendix C-4 of the Final EIR)

As shown in the following excerpt from Table 4-2 of the Project Traffic Analysis (Appendix N-2), the total trips for all land uses are summarized as 35,314 trips – consisting of 2,054 truck trips and 33,260 passenger vehicle trips as shown.

Total Passenger Cars	1,356	462	1,818	911	2,442	3,354	34,116	856	815	1,671
Internal Trip Reduction[3]	-86	-86	-172	-42	-42	-84	-856	-21	-21	-42
Total Trucks	83	32	115	33	86	119	2,054	9	4	13
Project Total Trips	**1,353**	**408**	**1,761**	**902**	**2,486**	**3,389**	**35,314**	**844**	**798**	**1,642**

Similarly, the following excerpt from Appendix C-1, shows that the total trips modeled in CalEEMod are 35,317 trips which is 3 trips higher than the 35,314 trips in Appendix N-2 (due to rounding in CalEEMod). Additionally, as noted above, the "user-defined industrial" and "user defined commercial" land use were utilized to model truck trips and to ensure the appropriate truck trip lengths and consequently emissions from trucks were modeled. If the two "user defined" land use categories are totaled, this equals 2,056 trips which represent truck trips and is actually 2 trips higher (due to rounding) than the 2,054 truck trips as illustrated in Appendix N-2. As shown, the passenger vehicle and truck trips are appropriately modeled in CalEEMod and no further changes are required. (Appendix C-4 of the Final EIR)

14064 West Campus Upper Plateau Ops Detailed Report, 10/6/2022

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	1,351	110	3.06	358,026	43,259	3,531	98.1	11,467,585
User Defined Commercial	705	58.2	52.9	189,665	22,590	1,864	1,694	6,074,985

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Office Park	19,719	1,601	1,453	5,300,336	394,977	32,067	29,101	106,165,726
Regional Shopping Center	6,354	12,303	8,990	2,766,960	52,049	112,827	82,441	23,751,698
Unrefrigerated Warehouse-No Rail	4,374	359	144	1,166,629	87,617	7,186	2,874	23,367,583
Refrigerated Warehouse-No Rail	669	54.5	22.0	178,407	13,400	1,092	441	3,573,488
City Park	2,145	5,550	6,202	1,171,975	42,961	111,175	124,221	23,474,668
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	1,351	110	3.06	358,026	43,259	3,531	98.1	11,467,585
User Defined Commercial	705	58.2	52.9	189,665	22,590	1,864	1,694	6,074,985

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

52 / 65

A-8.7 This comment questions the omission of SCAQMD's numeric threshold for GHG emissions. The suggested revision has not been included in the EIR for the following reasons.

As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), March JPA recognizes that SCAQMD has a numeric threshold for industrial projects, but March JPA has not adopted this or any other numeric threshold of significance. There is no requirement under CEQA, the CEQA Guidelines, caselaw or SCAQMD's adopted GHG thresholds to utilize a numeric threshold of significance to determine a Project's GHG impacts.

Instead, and as described in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR, the proposed Project was evaluated on the basis of whether or not it would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Importantly, March JPA evaluated the Project's impact on GHG based on consistency with the Riverside County Climate Action Plan (CAP), which is a qualified GHG reduction plan under CEQA Guidelines section 15183.5(b). "Pursuant to sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances." CEQA Guidelines § 15183.5. The Project site is located in the March JPA jurisdiction within Riverside County. Although the County of Riverside does not currently have direct authority over the Project, in June 2025, Riverside County will assume full land use control over the March JPA Planning Area, due to the planned reversion of March JPA's land use authority to the County of Riverside. Accordingly, consistency with the County's CAP provides an additional metric to determine if the Project's impacts are significant and provides an appropriate set of policies that are intended to guide development within unincorporated Riverside County. (Appendix C-4 of the Final EIR)

March JPA's approach is consistent with SCAQMD's Tier 2 threshold, which "consists of determining whether or not the project is consistent with a GHG reduction plan that may be part of a local general plan, for example. The concept embodied in this tier is equivalent to the existing concept of consistency in CEQA Guidelines §§15064(h)(3), 15125(d), or 15152(a). The GHG reduction plan must, at a minimum, comply with AB 32 GHG reduction goals; include emissions estimates agreed upon by either CARB or the AQMD, have been analyzed under CEQA, and have a certified Final CEQA document. Further, the GHG reduction plan must include a GHG emissions inventory tracking mechanism; process to monitor progress in achieving GHG emission reduction targets, and a commitment to remedy the excess emissions if GHG reduction goals are not met (enforcement). If the proposed project is consistent with the qualifying local GHG reduction plan, it is not significant for GHG emissions."[1] (Appendix C-4 of the Final EIR)

In addition to meeting CEQA Guidelines 15183.5(b), the Riverside County CAP meets SCAQMD's adopted Tier 2 standard. "The County's GHG reduction targets are consistent with the AB 32, SB 32, and EO S-3-05, and ensure that the County is providing GHG reductions locally that will complement the State and international efforts of stabilizing climate change." CAP Screening Tables, page 3. The County analyzed the CAP in an addendum to the Riverside County General Plan Environmental Impact

[1] https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2

Report No. 521[2], and filed a Notice of Determination on December 30, 2019.[3] The Riverside County CAP includes a GHG emissions inventory monitoring methodology (CAP section 7.6) and a commitment to update the CAP on or before January 1, 2030. The County's "program will ensure that the effectiveness of all implementation measures are reviewed in advance of 2030 and adjustments to assigned point values accounting for actual effectiveness are made in the post-2030 CAP. If measures included in this CAP Update are found to be ineffective, those measures will be removed or revised in the post-2030 CAP." As explained on pages 3-4 of the CAP screening tables, the CAP is a qualified GHG reduction plan under CEQA Guidelines section 15183.5. (Appendix C-4 of the Final EIR)

As explained in the CAP:

> "No single project has the ability to generate GHG emissions in sufficient quantities to change the global climate. Rather, it is the incremental contribution of all past, present, and future projects that when combined with all other anthropogenic sources of GHG emissions globally generates climate change impacts. Because GHG emissions are only important in the context of cumulative emissions, the focus of the analysis is on answering the question of whether incremental contributions of GHGs are a cumulatively considerable contribution to climate change impacts. The CAP Update includes a set of mitigation measures designed to substantially lessen cumulative impacts associated with GHG emissions as described in CEQA Guidelines §15130(a)(3), in determining if a project's effects would result in significant impacts." CAP screening tables, page 3.

Under the CAP, projects "that are determined to be above the 3,000 MT CO_2e emissions level shall quantify and disclose the anticipated GHG emissions of the proposed development." The EIR here quantified and disclosed the anticipated GHG emissions and used the latest version of the California Emissions Estimator Model (CalEEMod). Section 4.7, Greenhouse Gas Emissions, and Project GHG Analysis (Appendix I). (Appendix C-4 of the Final EIR)

Under the CAP, development projects can use screening tables that "assign points for each option incorporated into a project as mitigation or a project design feature (collectively referred to as "features"). The point values correspond to the minimum emissions reduction expected from each feature. The menu of features allows maximum flexibility and options for how development projects can implement the GHG reduction measures. Projects that garner at least 100 points will be consistent with the reduction quantities anticipated in the County's CAP Update. Consistent with CEQA Guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions." CAP screening table 7-8. See also Project GHG Analysis (Appendix I) and Section 4.7, Greenhouse Gas Emissions. (Appendix C-4 of the Final EIR). As Section 4.7, Greenhouse Gas Emissions, states "GHG emissions inherently contribute to cumulative impacts, and, thus, any additional GHG emissions would result in a cumulative impact" but consistency with statewide, regional, and local plans adopted for the purpose of reducing GHG emissions demonstrates a project's effects on climate change would not be cumulatively considerable.

As explained In Section 4.7, Greenhouse Gas Emissions, and the Project GHG Analysis (Appendix I):

[2] https://rctlmaplanning.rivcoweb.acsitefactory.com/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-AddendumNo1-EIRNo521.pdf

[3] https://rctlmaplanning.rivcoweb.acsitefactory.com/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-FNOD.pdf
https://rctlmaplanning.rivcoweb.acsitefactory.com/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-FNOD.pdf

> "The Project shall implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. With implementation of MM GHG-1 through MM GHG-~~11~~12, the Project would be consistent with the CAP's requirement to achieve at least 100 points and thus the Project is considered to have a less than significant individual and cumulatively considerable impact on GHG emissions. The March JPA shall verify incorporation of the identified Screening Table Measures within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The March JPA shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy."

This language has been clarified in the Final EIR to ensure that each Project site plan shall provide documentation demonstrating implementation of Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables. MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables. (Appendix C-4 of the Final EIR)

With implementation of MM-GHG-1 through MM-GHG-12, Section 4.7, Greenhouse Gas Emissions, determined that the proposed Project would be consistent with the Riverside County CAP and would therefore have a less than significant impact. As further explained in Response A-8.8, below, additional mitigation measures have been added to the Project that would further reduce the Project's GHG emissions. Because March JPA has not adopted a numeric threshold, and there is no requirement to do so, the revisions to the EIR suggested by the commenting agency have not been made. As explained above, the Project's GHG emissions and potential impacts have been analyzed in the Draft EIR consistent with the requirements of CEQA and mitigation measures have been incorporated to further reduce the Project's GHG emissions. (Appendix C-4 of the Final EIR)

A-8.8 This comment requests consideration of additional mitigation measures to address air quality and GHG emissions. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Please see Recirculated Section 4.2, Air Quality, for a detailed discussion and list of the mitigation measures being added to the Project, and Topical Response 2 – Air Quality, for an analysis of how the Project and its mitigation measures are consistent with the mitigation measures suggested for consideration by the commenting agency: (1) Office of the California Attorney General Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act; (2) Appendices IV-A, IV-B, and IV-C of the SCAQMD 2022 AQMP; and (3) U.S. EPA's Mobile Source Pollution – Environmental Justice and Transportation.

A-8.9 This comment states that should the proposed Project require the use of new stationary equipment, including emergency generators or fire pumps, permits from SCAQMD would be required, and recommends that this discussion be included in the Final EIR. There are no required or planned stationary equipment that require permits from SCAQMD. Please see the Final EIR and Appendix C-1 for analysis of emissions from potential emergency generators, including the application of MM-AQ-24.

A-8.10 This concluding comment is conclusory in nature and includes the commenting agency's request for written responses to comments prior to certification of the Final EIR in accordance with the purpose and goals of CEQA on public disclosure. Consistent with the requirements of CEQA and the commenting agency's request, responses to the commenting agency's specific comments on the Draft EIR are provided and responded to above.

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From: Taylor, Matthew <MTaylor@riversideca.gov>
Sent: Friday, March 10, 2023 4:32 PM
To: Dan Fairbanks
Cc: Futrell, Mike; Guzman, Rafael; Lilley, Jennifer; Christopoulos, Chris; Tinio, Maribeth
Subject: West Campus Upper Plateau Specific Plan and DEIR Comments - City of Riverside
Attachments: City Comment Letter_DEIR_West Campus Upper Plateau_Final_attachments.pdf

Good afternoon Dan,

Attached please find the City's comments on the WCUP SP and DEIR. A-9.1

Please let us know if you have any questions.

Thank you,

Matthew Taylor | Principal Planner
951.826.5944 | mtaylor@riversideca.gov

City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street | 3rd Floor | Riverside 92522

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Community Development
Department
Planning Division

City of Arts & Innovation

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Powers Authority
Planning Department
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Subject: City of Riverside's Review of the Draft Environmental Impact Report for the West Campus Upper Plateau Project

Dear Mr. Fairbanks:

Thank you for the opportunity to comment on March Joint Powers Authority's Draft Environmental Impact Report (DEIR) for the West Campus Upper Plateau Project, provided to the City on January 9, 2023.

The City of Riverside (City) understands that the project consists of the creation of a Specific Plan that will provide development standards, design guidelines, infrastructure master plans, maintenance responsibilities, phasing schedule, and implementation procedures necessary to develop Project Site. The City further understands that the Specific Plan will create 42.22 acres of Mixed Use, 65.32 acres of Business Park, 143.31 acres of Industrial, 37.91 acres of streets and roadways, 78 acres of developed Parks, Recreation, and Open Space, and 2.84 acres of Public Facilities. A-9.2

The City has reviewed the Draft West Campus Upper Plateau Specific Plan (Version 5) and submits the attached Summary of Comments for consideration.

In addition, the City has reviewed the DEIR and we wish to provide the following comments:

<u>Public Works – Traffic Engineering Division:</u>

- We request an opportunity to review the Construction Management Plan and request that March JPA schedule a meeting to discuss the traffic signal warrant analysis and associated improvements. Additionally, we request that March JPA coordinate with A-9.3

the Riverside Transit Authority (RTA) on any proposed bus stop amenities for Barton Street. Please provide information on the timeline or phasing program for any improvements.
- For your reference, please see the attached Traffic Analysis with additional comments.

A-9.3 Cont.

Appendix N – Transportation

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

A-9.4

<u>Community & Economic Development Department – Planning Division:</u>

Chapter 3.5 – Proposed Project

Section 3.5.1: Specific Plan Area

- **P117** – Uses table – This section of the Project Description indicates that "energy generation and distribution" are prohibited throughout all areas of the SPA. This would seem to prohibit rooftop or ground-mounted photovoltaics systems; however, elsewhere in the DEIR, installation of solar photovoltaics is required as a mitigation measure for various environmental impacts; please clarify. Additionally, the City recommends that the uses permitted within the Specific Plan be expanded to allow clean energy production including but not limited to hydrogen, solar and similar non-emitting renewable energy sources. Nonrenewable energy generation facilities (natural gas, etc.) should continue to be prohibited within the SPA.

A-9.5

- **P119 – Mixed Use Parcels** – The Project Description, and the proposed Specific Plan, propose no vehicular access from Barton Street for any of the Mixed Use parcels having frontage on this proposed street. However, given that the proposed Specific Plan allows for community-serving retail uses – and, indeed, assumes that 25% of the buildout of these parcels will be with retail uses – vehicular access from Barton Street would likely be necessary for the viability of retail and similar uses.
  If (and only if) Industrial-type uses, including Business Enterprise uses, are eliminated as permitted uses in the Mixed Use Zone as recommended by the City, the proposed Specific Plan should consider allowing vehicular access from Barton Street for neighborhood and visitor-serving retail uses only for the proposed Mixed-Use parcels along Barton Street, provided there is no vehicular access to Airman Drive. Vehicular through-access from Barton Street to Airman Drive and Cactus Avenue across the Mixed Use parcels should continue to be strictly prohibited. See also comments on Section 4.15 – Transportation.
  The DEIR and corresponding transportation and VMT analyses should be revised to analyze potential impacts and identify any necessary mitigation measures for this scenario if implemented.

A-9.6

Section 3.5.2: Project Design Features

- **P125 – PDF-NOI-1** – This PDF generally limits construction hours from 6am-10pm on any given day. In order to avoid potential noise impacts to surrounding sensitive receptors (i.e., residential neighborhoods), all outdoor construction activities throughout the project area should conform to City Noise Code (RMC Title 7) hours of operation (7-7, 8-5 Saturday, no construction Sunday or holidays).

A-9.7

- **P126 – PDF-TRA-1 – Barton Street** – This PDF states that the multipurpose trail "will only be accommodated for portions of Barton Street adjacent to the open space/parks." It is unclear from the project description which segments of the proposed Barton Street extension will and will not be constructed with the multipurpose trail improvements; and, further, it is unclear why this stipulation is proposed. Multipurpose trail connectivity should be accommodated along the entire length of the Barton Street extension in order to ensure connectivity and usability.

A-9.8

- **P127 – PDF-TRA-3 – Truck route enforcement** – This PDF states that truck route enforcement "shall be funded for 2 years." The project description indicates that construction of the project is anticipated to last at least 4.5 years; as such, it is unclear why 1) funding of the enforcement mechanism is limited to only 2 years; 2) when this 2-year funding period is intended to begin; and 3) how truck route enforcement will be funded and implemented after the conclusion of this 2-year period.

A-9.9

- **Figure 3-7H – Gas Backbone** – PDF-AQ-4 states that no natural gas infrastructure will be accommodated; however, this figure depicts the proposed construction of a full natural gas backbone infrastructure throughout the SPA. Why is this backbone network

A-9.10

necessary if no natural gas connections for future development will be accommodated? A-9.10 Cont.

Chapter 4 – Environmental Analysis

- **P172 – Cumulative Effects Analysis Methodology** – This section of the DEIR references a Figure 4-1, Cumulative Development Location Map, but this figure does not appear to be provided. Please clarify or revise the DEIR to incorporate this figure. A-9.11

Section 4.2 – Air Quality

- **P242 – Operational Health Risk Assessment** – The DEIR should evaluate the potential health impacts of exposure to DPM and other emissions related to operation of the project on users of the proposed active park, particularly children and similarly vulnerable populations. Measures should be taken to reduce exposure of park users to particulate matter emissions generated by the project should be to the greatest extent feasible. A-9.12

Section 4.4.1: Cultural Resources – Existing Conditions

- The integrity analysis for the Weapons Storage Area (WSA) Historic District was incorrectly completed as it analyzed historic integrity before determining eligibility. Eligibility must first be evaluated, then historic integrity is analyzed. The DEIR presents these items in the reverse. Per Chapter VIII of the National Register Bulletin #15, "Integrity is the ability of a property to convey its significance," and "Only after significance is fully established can you proceed to the issue of integrity." The significance of the structure is a key component of the integrity analysis as the weight of each aspect of integrity may vary based on the identified significance. For example, design will play more importance on a structure with architectural significance than a structure with significance for events. See page 45 of National Register Bulletin #15 for the steps in assessing integrity.
- Structures on the project site were not evaluated at the Riverside County level for designation as required by CEQA. Historical resources include only those that are eligible or listed within a local historical resources inventory.
- The evaluation of the WSA Igloos, states that the structures are the only of their kind in California yet asserts that they are not eligible for listing because they are not unique and other examples exists across the nation. The analysis does not consider local level of significance. As discussed in National Register Bulletin #15, "...if a property is of a type found throughout a State, or its boundaries extend over two States, but its importance relates only to a particular county, the property would be considered of local significance." While the WSA Igloos, may not have National significance, they are likely to have State and local significance, serving as the only examples in the State.

A-9.13

- The integrity analysis incorrectly applies integrity of association. Association is not solely connected to person of significance. Association include organization, agencies, groups, or events. Per National Register Bulletin #15, "Association is the direct link between an important historic event or person and the historic property." The analysis also incorrectly applies integrity of feeling. The analysis implies that feeling is directly connected to setting. Per National Register Bulletin #15, "Feeling is the property's expression of the aesthetic or historic sense of a particular period of time." Even if the setting has been altered, the structures may retain integrity of feeling as WSA Igloo provided there is sufficient presence of physical features that, taken together, convey the property's historic character.

A-9.13 Cont.

Section 4.4.5: Cultural Resources – Impacts Analysis

- The Impacts Analysis for Threshold 1 only discusses California Register and National Register eligibility and should include local register eligibility. This analysis may need to be adjusted based on previous comments.

A-9.14

Section 4.4.5: Cultural Resources – Cumulative Effects

- The analysis may need to be adjusted based on previous comments.

A-9.15

Section 4.5: Energy

- **P381 – Feasible Renewable Energy Features** – This section of the DEIR states that the "Specific Plan Area would install approximately [?] solar PV" – what quantity of solar PV is proposed to be installed?

A-9.16

Section 4.7: Greenhouse Gas Emissions

- **P439 – Table 4.7-3 Scoping Plan Consistency** – Action beginning "Further reduce vehicle miles traveled" – Response does not appear to address the specific action from the Scoping Plan as discusses employment growth projections for the RTP/SCS and AQMP and does not directly address the project's consistency with efforts to reduce VMT. This project will generate a substantial amount of new VMT and may be inconsistent with this Scoping Plan action.

A-9.17

- **P444 – Table 4.7-5 Project Consistency with the SCAG Connect SoCal RTP/SCS** – Measure "Reduce greenhouse gas emissions and improve air quality" – The project may be inconsistent with this measure. The statement "implementation of the Specific Plan would reduce traffic congestion, pollution, and fossil fuel dependence" is unsubstantiated and not supported by evidence. Other sections of this EIR identify significant and unavoidable impacts to criteria air pollutant emissions associated with operation of the project.

A-9.18

Section 4.10 – Land Use and Planning

- **P561 – Table 4.10-1: Project Consistency with March JPA General Plan Goals – Land Use Element Transportation Goal 8** – The project may not be consistent with this General Plan goal. Although public transit access exists within the general vicinity of the project area, and MM-GHG-11 would fund improvements to proximate transit facilities, there is no direct transit service or access to service within the majority of the SPA. Transit users wishing to access the Industrial or Business Park sections of the SPA (intersection of Cactus Avenue and Linebacker Drive) would need to traverse on foot or by bicycle approximately 1.5 miles via future Cactus Avenue and Brown Street to the nearest RTA bus stop (far side Alessandro Boulevard and Meridian Parkway) or 1.4 miles to the Moreno Valley/March Field Metrolink station. Transit users whose destinations are accessed from Bunker Hill, Airman or Arclight Drives would need to walk or cycle even further. Transit uses wishing to access the Mixed Use sections of the SPA between Barton Street and Airman Drive would have a more reasonable 0.5-mile walking or cycling trip to the nearest RTA bus stop (far side Alessandro Boulevard and Barton Street), but would have effectively no access to the Moreno Valley/March Field Metrolink station. These conditions conflict with MJPA General Plan Goal 8 which promotes "adequate, affordable, equitably distributed and energy efficient [sic] public and mass transit services which promote mobility to, from, and within the planning area" (emphasis added). This conflict with the MJPA General Plan Land Use Element goals and policies could result in a potentially significant impact under Threshold LU-1. Appropriate mitigation measures should be developed and applied to the project, including but not limited to enhanced pedestrian connectivity to nearby transit facilities, last-mile solutions for equitable access to transit facilities, measures to promote transit use for employees and visitors to the project, and other measures as appropriate. A-9.19
- **P567 – Table 4.10-1: Project Consistency with March JPA General Plan Goals – Housing** – The statement "housing is incompatible with airfield uses adjacent to the planning area" is unsubstantiated and contradicts the MARB/MIP LUCP, which only identifies residential development over 6.0du/ac (Compatibility Zone C2) or 3.0du/ac (Compatibility Zone C1) as incompatible land uses within these respective Compatibility Zones. A-9.20
- **P570 – Table 4.10-1: Project Consistency with March JPA General Plan Goals – Resource Management Element – Goal 7**: This consistency assessment may need to be revised depending on revisions needed to Chapter 4.4 (Cultural Resources) - see previous comments on Section 4.4 Cultural Resources. A-9.21

Section 4.11 – Noise

- **P623 – Onsite Operational Noise – Loading Dock Activity** – Site configurations, including loading dock locations, for all proposed parcels with the exception of the two proposed Plot Plans cannot reasonably be known at this level of analysis, and, as such, A-9.22

potential noise impacts on surrounding sensitive receptors (i.e., residential uses to the north, west and south of the SPA) cannot be reliably estimated or evaluated. Potentially significant impacts related to onsite operational noise could therefore result if individual site design does not properly address noise impacts. Mitigation measures should be incorporated, or development standards should be written into the proposed Specific Plan, requiring that all loading docks be oriented away and fully screened by buildings or terrain with no direct line-of-sight to any surrounding residential land use for all parcels that would allow uses that involve loading and unloading of trucks.

- **P651 – Figure 4.11-9 – Operational Noise Source Locations** – This figure suggests that the noise model did not assume any loading dock activity occurring on any of the Mixed-Use parcels; however, the proposed Specific Plan would allow "Business Enterprise" storage and distribution uses within the Mixed-Use areas, including warehousing uses up to 200,000 square feet, which should reasonably be expected to include potential loading dock areas. The model and outputs should be revised, and the analysis updated, to reflect this potential use within the Mixed-Use areas.

A-9.22 Cont.

Section 4.12 – Population and Housing

- **P656 – 4.12.1 Existing Conditions – Jobs/Housing Balance** – This paragraph states that the four member jurisdictions of the MJPA are "recognized by the State of California as in compliance with Housing Element Law"; however, unincorporated Riverside County does not have an HCD-certified Housing Element as of March 2023 and is in an "out of compliance" status with Housing Element Law. The City of Riverside Housing Element was certified by HCD on September 25, 2022.

A-9.23

- **P661 – Housing Projections and P 663 – 4.12.7 – Cumulative Effects** – The DEIR concludes that, with the area increase of 2,600 jobs at project buildout, "the potential need to provide housing for approximately 2,600 employees is supported by existing conditions within unincorporated Riverside County or within surrounding cities within the County" and that this impact is less than significant and not cumulatively considerable. However, SCAG's 6th Cycle RHNA Allocation Methodology, which determines the number of housing units each member jurisdiction must plan to accommodate within the 2021-2029 Housing Element cycle, relies heavily on population, household and employment growth projections from the 2016 Connect SoCal RTP/SCS. The 2016 RTP/SCS did not factor additional employment growth associated with the project into its growth forecast and, by extension, the RHNA allocation methodology does not account for the additional housing need induced by the project. By itself, this could be considered a potentially significant impact under threshold POP-1. Moreover, the 2016 RTP-SCS would not have incorporated other more recently adopted Specific Plans, Specific Plan Amendments and similar land use changes within the JPA and surrounding/member jurisdictions that result in additional employment growth that

A-9.24

would potentially cumulatively exceed the 2016 RTP/SCS growth projections and, by extension, the 6th Cycle RHNA allocation assigned to each jurisdiction that is necessary to accommodate the associated excess employment growth. A-9.24 Cont.

Section 4.15 – Transportation

- **P696** – The DEIR states that "Additionally, direct access to retail uses would be via internal roadways of Airman Drive, Arclight Drive, Linebacker Drive and Bunker Hill. There would be no direct access to retail uses from Barton Street." In order to provide opportunities for community-service retail uses to be established within the Mixed Use areas of the SPA, City Staff recommend that vehicular access to Mixed Use-zoned parcels fronting on Barton Street be permitted for non-industrial uses only; should the proposed Specific Plan be revised to permit vehicular access as such, this statement and the corresponding analysis in this Section of the DEIR should be revised accordingly. A-9.25
- **P714 – 4.15.5 – Thresholds of Significance – VMT Impact Thresholds** – The DEIR states in this section that "The proposed Project would be considered a mix of retail, office, business park, medical, , research and development, and services." This statement 1) does not identify the land use categorization rubric used to establish the constituent land uses within the project and 2) appears to have omitted significant components of the proposed land use program, i.e., high-cube fulfillment and cold storage warehouse, for example. The DEIR should clarify whether, and, if so, under which category, the multiple millions of square feet of warehousing and logistics-related land uses proposed were categorized for the purpose of determining appropriate significance thresholds for the Project's VMT impacts. A-9.26
- **P717 – 4.15.6 – Impacts Analysis – Specific Plan Area, Operations** – The DEIR states in this section describes physical improvements (e.g., "channelization") that would prevent large vehicles such as trucks from making specified turning movements onto roadways within and surrounding the project area. The DEIR further concludes that "the above-mentioned improvements would enhance public transit, roadway, bicycle, or pedestrian facilities. The Project would not include any improvements that would interfere with the construction of pedestrian or bicycle facilities in the future. Therefore, no impacts to alternative transportation facilities would occur, and no mitigation measures are required." This conclusion does not address potential future bus or other mass transit service that may be established within the SPA in the future to serve users accessing the proposed SPA. This conclusion should be reevaluated to address the potential for bus service on roadways within the SPA in the future and address whether there are potential impacts to future transit service that are not sufficiently addressed in the DEIR. A-9.27

Chapter 5.5 – Growth-Inducing Impacts

- **P858** – The DEIR states that the project would stimulate population growth "consistent with employment growth envisioned in local and regional land use plans […] because the planned growth of the Project and its land use intensity have been factored into the underlying growth projections of the SCAG 2020-2045 RTP/SCS." This project involves land use changes that have not been adopted by the MJPA, are thus not reflected in the MJPA General Plan, and were therefore not a part of the baseline conditions used to prepare the 2020 RTP/SCS growth projections. For this reason, this conclusion is inaccurate. A-9.28

Chapter 6.4 – Alternatives Under Consideration

- **P861 – Alternative 3 – Restricted Industrial Building Size Alternative** – There is no clear rationale offered for the reduction of industrial building size conceived under this alternative development scenario (two, 490,225-sf buildings in lieu of one, 1,225,000-sf buildings). This alternative could have just as easily evaluated a larger or smaller reduction in building size or division of this proposed parcel into more than two lots with similar FARs as that which was analyzed in the DEIR. There is further no clear explanation or rationale as to why other alternative scenarios, such as a development plan with a further reduced Industrial land use (in favor of expanded Mixed Use or Business Park land uses), or an alternative development plan with no Industrial land uses at all (opting instead for all Business Park, all Mixed Use, or a combination of both) was not considered. Reductions in developable square footage or potential employment resulting from reduced or eliminated Industrial land uses comparted to the project could be offset by changes to the Specific Plan development standards governing maximum development intensity within the Business Park and/or Mixed Use areas. None of these scenarios would fail to meet any of the Project Objectives; all are within the reasonable range of alternatives warranting consideration by the Lead Agency and therefore warrant analysis as alternatives to the Project in addition to those considered in the DEIR. A-9.29
- **P913 – Figure 6-1 – Reduced Development Area Alternative** – this figure does not appear to depict the Reduced Development Area alternative described in the DEIR and in fact appears to depict the project as proposed. A-9.30

Appendix C-1 – Air Quality Report

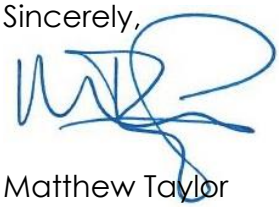
- We request detailed information on how the project will comply with Rule 2305 and how future lease agreements will implement emission reducing strategies.
- Please include public signage which displays the South Coast Air Quality Management District's, or appropriate authority's, phone number to report violations. A-9.31

Appendix C-2 – Health Risk Assessment

- The modeling and analysis should be revised evaluate the potential health impacts of exposure to DPM and other emissions related to operation of the project on users of the proposed active park, particularly children and similarly vulnerable populations. A-9.32

Should you have any questions regarding this letter, please contact Scott Watson, Historic Preservation Officer, at (951) 826-5507, or by e-mail at swatson@riversideca.gov.
The City of Riverside appreciates your consideration of the comments provided in this letter. We thank you again for the opportunity to provide comments on this proposal and look forward to working with you in the future. A-9.33

Sincerely,



Matthew Taylor
Principal Planner

Attachments:

- MJPA West Campus Upper Plateau Specific Plan – Draft #5 – Comments Summary
- Comments from the Traffic Division on the Traffic Analysis
- National Register Bulletin: How To Apply the National Register Criteria for Evaluation

cc: Patricia Lock Dawson, Mayor
Riverside City Council Members
Mike Futrell, City Manager
Rafael Guzman, Assistant City Manager
Jennifer Lilley, Director, Community & Economic Development Department
Maribeth Tinio, City Planner
Gil Hernandez, Public Works Director
Phaedra Norton, City Attorney

MJPA West Campus Upper Plateau Specific Plan – Draft #5

City of Riverside Planning Division Staff Comments – March 9, 2023

1. **Chapter ES.1 – Project Overview**
    a. **Land Uses**
        i. **Business Park (BP)**: Includes warehousing up to 200,000sf as a permitted use. Recommend limiting to 100,000sf within 800ft of residential zone or use for consistency with City standards.
        ii. **Mixed Use (MU)**: Not consistent with uses that typically comprise mixed-use districts in the City of Riverside. Recommend eliminate Business Enterprises uses from this land use designation.

A-9.34

2. **Chapter 1 – Introduction**
    a. **1.2 – Specific Plan Objectives**
        i. Recommend additional objective to be added: "Prioritize compatibility of new development with existing adjoining sensitive land uses, particularly residential neighborhoods, park and recreation areas, schools and places of worship through comprehensive and context-sensitive development and design standards."

A-9.35

    b. **1.7 – Discretionary Actions**
        i. **Plot Plans:** Why are these specific development applications included in the Specific Plan document? These should be subsequent rather than concurrent approvals.

A-9.36

3. **Chapter 2 – Land Use**
    a. **2.3 – Land Use Compatibility**
        i. There is no discussion in this section of land use compatibility with other adjoining sensitive uses including but not limited to residential neighborhoods, park, recreation and open space areas, schools and places of worship. Recommend this section be expanded to address how the Specific Plan preserves, maintains and promotes compatibility with adjoining and nearby land uses.

A-9.37

    b. **2.4 – Land Use Plan**
        i. **Business Park**: Includes warehousing up to 200,000sf as a permitted use. Recommend limiting to 100,000sf within 800ft of residential for consistency with City standards.
        ii. **Mixed Use**: Not consistent with uses that typically comprise mixed-use districts. Recommend eliminate Business Enterprise uses from this land use designation.

A-9.38

4. **Chapter 3 – Development Regulations**
    a. **3.4 – Permitted, Conditional and Ancillary Uses**
        i. **Table 3-1 – West Campus Upper Plateau Specific Plan Land Use Table**

A-9.39

1. Recommend prohibiting Business Enterprise uses in the Mixed Use District.
2. Recommend adding non-emitting, renewable energy generation and distribution facilities (including but not limited to hydrogen, solar photovoltaics, etc.) as a permitted use (nonrenewable generation should remain prohibited).
3. Recommend reinstating deleted Footnote 4 and modifying footnote to limit Business Enterprise uses to a maximum of 100,000sf when located within 800 feet of a residential zone or use.

A-9.39 Cont.

b. 3.5 – Development Standards

i. Table 3-2 – Development Standards

ii. 3.5.3 – Driveway Widths and Locations

1. If Industrial (including Business Enterprise) uses are eliminated as permitted uses in the Mixed Use Zone as recommended above, then recommend vehicular access be permitted from Barton Street provided that there is no vehicular access provided to Airman Drive.

A-9.40

iii. 3.5.4 – Off-Street Loading Facilities

1. These provisions should be expanded to require that off-street loading and unloading facilities shall be fully screened from view of any residential zone or property through building orientation and/or fully opaque screen walls.

5. Chapter 4 – Design Guidelines

a. 4.1 – Purpose and Intent

i. Recommend additional objective: "To protect surrounding sensitive uses, including residential neighborhoods, parks, open space and recreation areas, schools and places of worship, from the potential negative visual and aesthetic impacts of future development within the Specific Plan Area."

A-9.41

b. 4.3 – Architectural Design Guidelines

i. 4.3.1 – Building Form

1. **b.** - Recommend this be made more specific/objective. "Periodic" is a subjective measure.

ii. 4.3.2 – Building Materials, Colors and Textures

1. **d.** – Recommend building color schemes be "light earth, neutral or gray tones"

A-9.42

c. 4.4 – Site Features

i. 4.4.2 – Truck Courts and Loading Docks

1. **a.** – This provision should be a "shall" instead of a "should"

2. **b.** – This provision should be amended to add "or in any location having a direct line of site from surrounding residential land uses."
3. **c.** – This provision should be removed from the Design Guidelines (Chapter 4) and made into a Development Standard (Chapter 3), and be revised to delete "should" in favor of "shall."

ii. 4.4.4 – Rooftop Equipment

1. **a.** - Recommended addition or new provision: "Building parapet walls shall be at least as high at the shortest distance between roof surface and top of parapet as the tallest piece of roof-mounted equipment." This ensures that roof-mounted equipment is fully screened from any vantage point.

iii. 4.4.8 – Conservation Easement Protection

1. **c.** – "All lighting *near* the Conservation Easement shall be in compliance with the Dark Sky parameters […]" – this provision should be amended to eliminate the term "near" in favor of a specified distance.

A-9.42 Cont.

6. Chapter 6 – Infrastructure and Grading

a. 6.8 – Grading

i. 6.8.1 – Grading Plan Development Standards

1. "Cut and fill slopes shall be constructed at inclinations of no steeper than two horizontal feet to one vertical foot *unless otherwise approved by the MJPA*." Through what processes and under what circumstances? Are there standard criteria for whether departures from minimum grading standards shall be granted?
2. Recommend reduction of minimum slope height requiring permanent landscaping and irrigation from 10 feet to 6 feet, consistent with City of Riverside requirements for manufactured slopes.

A-9.43

7. Chapter 7 – Implementation

a. 7.4 – Development Review Process

i. 7.4.2 – Development Plan Review

1. Recommend addition of a requirement for public notification of pending development applications by certified US Mail to surrounding property owners within a specified radius for a specified minimum of period of time prior to decision on discretionary actions consistent with Section 9.020.200 of the March JPA Development Code.
2. Further recommend a formalized requirement for notification to surrounding jurisdictions of all pending development applications upon acceptance of completed application.

A-9.44

MEMORANDUM

Engineering

DATE: 02/06/2023

TO: Fairbanks, Dan
FROM: Vital Patel
CC: Philip Nitollama
RE: March JPA – West Campus Upper Plateau Project

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

1. The Public works Traffic Division would like to request a meeting to discuss the traffic signal warrant analysis and the improvements.

2. The Traffic Division would like to request an opportunity to review the Construction Management Plan.

3. Please provide information on timeline/ phasing program of improvements.

4. Please provide information and co-ordinate with RTA on any proposed bus stop and bus-stop amenities for the Barton Street.

5. Section 1.10 – Traffic calming measure: The project should be conditioned to construct the speed feedback signs, speed limit signs, advisory speed signs, curb ahead warning signs and associated striping along Barton Street. Locations and quantities to be determined.

6. Section 3.5, Truck route: The section includes that "No trucks access is permitted along Barton Street. The Project Applicant and the City should work together on an appropriate mitigation measure to ensure Project traffic adheres to the routes as shown on the Project (Truck) trip distribution." – The project should be conditioned to work with the City of Riverside to finalize appropriate improvements to ensure that project truck traffic adheres to the adopted truck routes.

A-9.45

7. Section 1.6.1 Site Adjacent and Site Access Recommendations:

   Recommendation 5 – Barton Street:

   - Please provide on-street parking adjacent to trail. If no parking is permitted on the street, then is there an off-street parking facility available? Where do trail users park?

   - Please evaluate adding a parking lane next to the multi-purpose trail segment and adding "No Parking" signs for the rest of the roadway segment.

8. Table 1-4: If striping plans are not provided prior to acceptance of the traffic study, can a condition of approval be added to the project to provide the striping plan? (Striping plans are to show feasibility of all the improvements)

A-9.45
Cont.

NATIONAL REGISTER BULLETIN

Technical information on the the National Register of Historic Places:
survey, evaluation, registration, and preservation of cultural resources

U.S. Department of the Interior
National Park Service
Cultural Resources
National Register, History and Education

How to Apply the National Register Criteria for Evaluation









The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to tribes.

The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.

This material is partially based upon work conducted under a cooperative agreement with the National Conference of State Historic Preservation Officers and the U.S. Department of the Interior.

Date of publication: 1990; revised 1991, 1995, 1997. Revised for Internet 1995.

Cover

(Top Left) ***Criterion B - Frederick Douglass Home,*** *Washington, D.C. From 1877-1899, this was the home of Frederick Douglass, the former slave who rose to become a prominent author, abolitionist, editor, orator, and diplomat. (Walter Smalling, Jr.)*

(Top Right) ***Criterion D - Francis Canyon Ruin,*** *Blanco vicinity, Rio Arriba County, New Mexico. A fortified village site composed of 40 masonry-walled rooms arranged in a cluster of four house blocks. Constructed ca. 1716-1742 for protection against raiding Utes and Comanches, the site has information potential related to Navajo, Pueblo, and Spanish cultures. (Jon Samuelson)*

(Bottom Left) ***Criterion C - Bridge in Cherrytree Township,*** *Venago County, Pennsylvania. Built in 1882, this Pratt through truss bridge is significant for engineering as a well preserved example of a type of bridge frequently used in northwestern Pennsylvania in the late 19th century. (Pennsylvania Department of Transportation)*

(Bottom Right) ***Criterion A - Main Street/Market Square Historic District,*** *Houston, Harris County, Texas. Until well into the 20th century this district marked the bounds of public and business life in Houston. Constructed between the 1870s and 1920s, the district includes Houston's municipal and county buildings, and served as the city's wholesale, retail, and financial center. (Paul Hester)*

PREFACE

Preserving historic properties as important reflections of our American heritage became a national policy through passage of the Antiquities Act of 1906, the Historic Sites Act of 1935, and the National Historic Preservation Act of 1966, as amended. The Historic Sites Act authorized the Secretary of the Interior to identify and recognize properties of national significance (National Historic Landmarks) in United States history and archeology. The National Historic Preservation Act of 1966 authorized the Secretary to expand this recognition to properties of local and State significance in American history, architecture, archeology, engineering, and culture, and worthy of preservation. The National Register of Historic Places is the official list of these recognized properties, and is maintained and expanded by the National Park Service on behalf of the Secretary of the Interior.[1]

The National Register of Historic Places documents the appearance and importance of districts, sites, buildings, structures, and objects significant in our prehistory and history. These properties represent the major patterns of our shared local, State, and national experience. To guide the selection of properties included in the National Register, the National Park Service has developed the National Register Criteria for Evaluation. These criteria are standards by which every property that is nominated to the National Register is judged. In addition, the National Park Service has developed criteria for the recognition of nationally significant properties, which are designated National Historic Landmarks and prehistoric and historic units of the National Park System. Both these sets of criteria were developed to be consistent with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation*, which are uniform, national standards for preservation activities.[2]

This publication explains how the National Park Service applies these criteria in evaluating the wide range of properties that may be significant in local, State, and national history.

It should be used by anyone who must decide if a particular property qualifies for the National Register of Historic Places.

Listing properties in the National Register is an important step in a nationwide preservation process. The responsibility for the identification, initial evaluation, nomination, and treatment of historic resources lies with private individuals, State historic preservation offices, and Federal preservation offices, local governments, and Indian tribes. The final evaluation and listing of properties in the National Register is the responsibility of the Keeper of the National Register.

This bulletin was prepared by staff of the National Register Branch, Interagency Resources Division, National Park Service, with the assistance of the History Division. It was originally issued in draft form in 1982. The draft was revised into final form by Patrick W. Andrus, Historian, National Register, and edited by Rebecca H. Shrimpton, Consulting Historian.

Beth L. Savage, National Register and Sarah Dillard Pope, National Register, NCSHPO coordinated the latest revision of this bulletin. Antionette J. Lee, Tanya Gossett, and Kira Badamo coordinated earlier revisions.

[1]Properties listed in the National Register receive limited Federal protection and certain benefits. For more information concerning the effects of listing, and how the National Register may be used by the general public and Certified Local Governments, as well as by local, State, and Federal agencies, and for copies of National Register Bulletins, contact the National Park Service, National Register, 1849 C Street, NW, NC400, Washington, D.C., 20240. Information may also be obtained by visiting the National Register Web site at **www.cr.nps.gov/nr** or by contacting any of the historic preservation offices in the States and territories.

[2]The *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* are found in the *Federal Register*, Vol. 48, No. 190 (Thursday, September 29, 1983). A copy can be obtained by writing the National Park Service, Heritage Preservation Services (at the address above).

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I. INTRODUCTION

The National Register is the nation's inventory of historic places and the national repository of documentation on the variety of historic property types, significance, abundance, condition, ownership, needs, and other information. It is the beginning of a national census of historic properties. The National Register Criteria for Evaluation define the scope of the National Register of Historic Places; they identify the range of resources and kinds of significance that will qualify properties for listing in the National Register. The Criteria are written broadly to recognize the wide variety of historic properties associated with our prehistory and history.

Decisions concerning the significance, historic integrity, documentation, and treatment of properties can be made reliably only when the resource is evaluated within its historic context. The historic context serves as the framework within which the National Register Criteria are applied to specific properties or property types. (See *Part V* for a brief discussion of historic contexts. Detailed guidance for developing and applying historic contexts is contained in *National Register Bulletin: How to Complete the National Register Registration Form* and *National Register Bulletin: How to Complete the National Register Multiple Property Documentation Form*)

The guidelines provided here are intended to help you understand the National Park Service's use of the Criteria for Evaluation, historic contexts, integrity, and Criteria Considerations, and how they apply to properties under consideration for listing in the National Register. Examples are provided throughout, illustrating specific circumstances in which properties are and are not eligible for the National Register. This bulletin should be used by anyone who is:

- Preparing to nominate a property to the National Register,
- Seeking a determination of a property's eligibility,
- Evaluating the comparable significance of a property to those listed in the National Register, or
- Expecting to nominate a property as a National Historic Landmark in addition to nominating it to the National Register.

This bulletin also contains a summary of the National Historic Landmarks Criteria for Evaluation (see *Part IX*). National Historic Landmarks are those districts, sites, buildings, structures, and objects designated by the Secretary of the Interior as possessing national significance in American history, architecture, archeology, engineering, and culture. Although National Register documentation includes a recommendation about whether a property is significant at the local, State, or national level, the only official designation of national significance is as a result of National Historic Landmark designation by the Secretary of the Interior, National Monument designation by the President of the United States, or establishment as a unit of the National Park System by Congress. These properties are automatically listed in the National Register.

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II. THE NATIONAL REGISTER CRITERIA FOR EVALUATION

CRITERIA FOR EVALUATION:[3]

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

B. That are associated with the lives of persons significant in our past; or

C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. That have yielded, or may be likely to yield, information important in prehistory or history.

CRITERIA CONSIDERATIONS:

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

a. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or

b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

c. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or

d. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or

g. A property achieving significance within the past 50 years if it is of exceptional importance.

[3]The Criteria for Evaluation are found in the *Code of Federal Regulations, Title 36, Part 60,* and are reprinted here in full.

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III. HOW TO USE THIS BULLETIN TO EVALUATE A PROPERTY

For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by:

- **Being associated with an important historic context** *and*
- **Retaining historic integrity of those features necessary to convey its significance.**

Information about the property based on physical examination and documentary research is necessary to evaluate a property's eligibility for the National Register. Evaluation of a property is most efficiently made when following this sequence:

1. Categorize the property (Part IV). A property must be classified as a district, site, building, structure, or object for inclusion in the National Register.
2. **Determine which prehistoric or historic context(s) the property represents** (Part V). A property must possess significance in American history, architecture, archeology, engineering, or culture when evaluated within the historic context of a relevant geographic area.
3. Determine whether the property is significant under the National Register Criteria (Part VI). This is done by identifying the links to important events or persons, design or construction features, or information potential that make the property important.
4. Determine if the property represents a type usually excluded from the National Register (Part VII). If so, determine if it meets any of the Criteria Considerations.
5. Determine whether the property retains integrity (Part VIII). Evaluate the aspects of location, design, setting, workmanship, materials, feeling, and association that the property must retain to convey its historic significance.

If, after completing these steps, the property appears to qualify for the National Register, the next step is to prepare a written nomination. (Refer to *National Register Bulletin: How to Complete the National Register Registration Form.*)

IV. HOW TO DEFINE CATEGORIES OF HISTORIC PROPERTIES

The National Register of Historic Places includes significant properties, classified as buildings, sites, districts, structures, or objects. It is not used to list intangible values, except in so far as they are associated with or reflected by historic properties. The National Register does not list cultural events, or skilled or talented individuals, as is done in some countries. Rather, the National Register is oriented to recognizing physically concrete properties that are relatively fixed in location.

For purposes of National Register nominations, small groups of properties are listed under a single category, using the primary resource. For example, a city hall and fountain would be categorized by the city hall (building), a farmhouse with two outbuildings would be categorized by the farmhouse (building), and a city park with a gazebo would be categorized by the park (site). Properties with large acreage or a number of resources are usually considered districts. Common sense and reason should dictate the selection of categories.

BUILDING

A building, such as a house, barn, church, hotel, or similar construction, is created principally to shelter any form of human activity. "Building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.

Buildings eligible for the National Register must include all of their basic structural elements. Parts of buildings, such as interiors, facades, or wings, are not eligible independent of the rest of the existing building. The whole building must be considered, and its significant features must be identified.

If a building has lost any of its basic structural elements, it is usually considered a "ruin" and is categorized as a site.

Examples of buildings include:

administration building
carriage house
church
city or town hall
courthouse
detached kitchen, barn, and privy
dormitory
fort
garage
hotel
house
library
mill building
office building
post office
school
social hall
shed
stable
store
theater
train station

STRUCTURE

The term "structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter.

Structures nominated to the National Register must include all of the extant basic structural elements. Parts of structures can not be considered eligible if the whole structure remains. For example, a truss bridge is composed of the metal or wooden truss, the abutments, and supporting piers, all of which, if extant, must be included when considering the property for eligibility.

If a structure has lost its historic configuration or pattern of organization through deterioration or demolition, it is usually considered a "ruin" and is categorized as a site.

Examples of structures include:

aircraft
apiary
automobile
bandstand
boats and ships
bridge
cairn
canal
carousel
corncrib
dam
earthwork
fence
gazebo
grain elevator
highway
irrigation system
kiln
lighthouse
railroad grade
silo
trolley car
tunnel
windmill

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OBJECT

The term "object" is used to distinguish from buildings and structures those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.

Small objects not designed for a specific location are normally not eligible. Such works include transportable sculpture, furniture, and other decorative arts that, unlike a fixed outdoor sculpture, do not possess association with a specific place.

Objects should be in a setting appropriate to their significant historic use, roles, or character. Objects relocated to a museum are inappropriate for listing in the National Register.

Examples of objects include:

boundary marker
fountain
milepost
monument
scupture
statuary

SITE

A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.

A site can possess associative significance or information potential or both, and can be significant under any or all of the four criteria. A site need not be marked by physical remains if it is the location of a prehistoric or historic event or pattern of events and if no buildings, structures, or objects marked it at the time of the events. However, when the location of a prehistoric or historic event cannot be conclusively determined because no other cultural materials were present or survive, documentation must be carefully evaluated to determine whether the traditionally recognized or identified site is accurate.

A site may be a natural landmark strongly associated with significant prehistoric or historic events or patterns of events, if the significance of the natural feature is well documented through scholarly research. Generally, though, the National Register excludes from the definition of "site" natural waterways or bodies of water that served as determinants in the location of communities or were significant in the locality's subsequent economic development. While they may have been "avenues of exploration," the features most appropriate to document this significance are the properties built in association with the waterways.

Examples of sites include:

battlefield
campsite
cemeteries significant for information potential or historic association
ceremonial site
designed landscape
habitation site
natural feature (such as a rock formation) having cultural significance
petroglyph
rock carving
rock shelter
ruins of a building or structure
shipwreck
trail
village site

DISTRICT

A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.

CONCENTRATION, LINKAGE, & CONTINUITY OF FEATURES

A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties. For example, a district can reflect one principal activity, such as a mill or a ranch, or it can encompass several interrelated activities, such as an area that includes industrial, residential, or commercial buildings, sites, structures, or objects. A district can also be a grouping of archeological sites related primarily by their common components; these types of districts often will not visually represent a specific historic environment.

SIGNIFICANCE

A district must be significant, as well as being an identifiable entity. It must be important for historical, architectural, archeological, engineering, or cultural values. Therefore, districts that are significant will usually meet the last portion of Criterion C plus Criterion A, Criterion B, other portions of Criterion C, or Criterion D.

TYPES OF FEATURES

A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.

A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity. In archeological districts, the primary factor to be considered is the effect of any disturbances on the information potential of the district as a whole.

GEOGRAPHICAL BOUNDARIES

A district must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management, or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.

DISCONTIGUOUS DISTRICTS

A district is usually a single geographic area of contiguous historic properties; however, a district can also be composed of two or more definable significant areas separated by nonsignificant areas. A discontiguous district is most appropriate where:

- Elements are spatially discrete;
- Space between the elements is not related to the significance of the district; and
- Visual continuity is not a factor in the significance.

In addition, a canal can be treated as a discontiguous district when the system consists of man-made sections of canal interspersed with sections of river navigation. For scattered archeological properties, a discontiguous district is appropriate when the deposits are related to each other through cultural affiliation, period of use, or site type.

It is not appropriate to use the discontiguous district format to include an isolated resource or small group of resources which were once connected to the district, but have since been separated either through demolition or new construction. For example, do not use the discontiguous district format to nominate individual buildings of a downtown commerical district that have become isolated through demolition.

Examples of districts iE,[;lude:

business districts
canal systems
groups of habitation sites
college campuses
estates and farms with large acreage/ numerous properties
industrial complexes
irrigation systems
residential areas
rural villages
transportation networks
rural historic districts



Ordeman-Shaw Historic District, *Montgomery, Montgomery County, Alabama. Historic districts derive their identity from the interrationship of their resources. Part of the defining characteristics of this 19th century residential district in Montgomery, Alabama, is found in the rhythmic pattern of the rows of decorative porches. (Frank L. Thiermonge, III)*

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V. HOWTOEVALUATEA PROPERTY WITHIN ITS HISTORIC CONTEXT

UNDERSTANDING HISTORIC CONTEXTS

To qualify for the National Register, a property must be significant; that is, it must represent a significant part of the history, architecture, archeology, engineering, or culture of an area, and it must have the characteristics that make it a good representative of properties associated with that aspect of the past. This section explains how to evaluate a property within its historic context.

The significance of a historic property can be judged and explained only when it is evaluated within its historic context. Historic contexts are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear. Historians, architectural historians, folklorists, archeologists, and anthropologists use different words to describe this phenomena such as trend, pattern, theme, or cultural affiliation, but ultimately the concept is the same.

The concept of historic context is not a new one; it has been fundamental to the study of history since the 18th century and, arguably, earlier than that. Its core premise is that resources, properties, or happenings in history do not occur in a vacuum but rather are part of larger trends or patterns.

In order to decide whether a property is significant within its historic context, the following five things must be determined:

- The facet of prehistory or history of the local area, State, or the nation that the property represents;
- Whether that facet of prehistory or history is significant;
- Whether it is a type of property that has relevance and importance in illustrating the historic context;
- How the property illustrates that history; and finally
- Whether the property possesses the physical features necessary to convey the aspect of prehistory or history with which it is associated.

These five steps are discussed in detail below. If the property being evaluated does represent an important aspect of the area's history or prehistory *and* possesses the requisite quality of integrity, then it qualifies for the National Register.

HOW TO EVALUATE APROPERTY WITHIN ITS HISTORIC CONTEXT

Identify what the property represents: the theme(s), geographical limits, and chronological period that provide a perspective from which to evaluate the property's significance.

Historic contexts are historical patterns that can be identified through consideration of the history of the property and the history of the surrounding area. Historic contexts may have already been defined in your area by the State historic preservation office, Federal agencies, or local governments. In accordance with the National Register Criteria, the historic context may relate to one of the following:

- An event, a series of events or activities, or patterns of an area's development (Criterion A);
- Association with the life of an important person (Criterion B);
- A building form, architectural style, engineering technique, or artistic values, based on a stage of physical development, or the use of a material or method of construction that shaped the historic identity of an area (Criterion C); or
- A research topic (Criterion D).

[4] For a complete discussion of historic contexts, see *National Register Bulletin: Guidelines for Completing National Register of Historic Places Registration Forms.*

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Determine how the theme of the context is significant in the history of the local area, the State, or the nation.

A theme is a means of organizing properties into coherent patterns based on elements such as environment, social/ethnic groups, transportation networks, technology, or political developments that have influenced the development of an area during one or more periods of prehistory or history. A theme is considered significant if it can be demonstrated, through scholarly research, to be important in American history. Many significant themes can be found in the following list of Areas of Significance used by the National Register.

AREAS OF SIGNIFICANCE

Agriculture
Architecture
Archeology
  Prehistoric
  Historic—Aboriginal
  Historic—Non-Aboriginal
Art
Commerce
Communications
Community Planning and Development
Conservation
Economics
Education
Engineering
Entertainment/Recreation
Ethnic Heritage
  Asian
  Black
  European
  Hispanic
  Native American
  Pacific Islander
  Other
Exploration/Settlement
Health/Medicine
Industry
Invention
Landscape Architecture
Law
Literature
Maritime History
Military
Performing Arts
Philosophy
Politics/Government
Religion
Science
Social History
Transportation
Other

Determine what the property type is and whether it is important in illustrating the historic context.

A context may be represented by a variety of important property types. For example, the context of "Civil War Military Activity in Northern Virginia" might be represented by such properties as: a group of mid-19th century fortification structures; an open field where a battle occurred; a knoll from which a general directed troop movements; a sunken transport ship; the residences or public buildings that served as company headquarters; a railroad bridge that served as a focal point for a battle; and earthworks exhibiting particular construction techniques.

Because a historic context for a community can be based on a distinct period of development, it might include numerous property types. For example, the context "Era of Industrialization in Grand Bay, Michigan, 1875 - 1900" could be represented by important property types as diverse as sawmills, paper mill sites, salt refining plants, flour mills, grain elevators, furniture factories, workers housing, commercial buildings, social halls, schools, churches, and transportation facilities.

A historic context can also be based on a single important type of property. The context "Development of County Government in Georgia, 1777 - 1861" might be represented solely by courthouses. Similarly, "Bridge Construction in Pittsburgh, 1870 - 1920" would probably only have one property type.

Determine how the property represents the context through specific historic associations, architectural or engineering values, or information potential (the Criteria for Evaluation).

For example, the context of county government expansion is represented under Criterion A by historic districts or buildings that reflect population growth, development patterns, the role of government in that society, and political events in the history of the State, as well as the impact of county government on the physical development of county seats. Under Criterion C, the context is represented by properties whose architectural treatments reflect their governmental functions, both practically and symbolically. (See *Part VI: How to Identify the Type of Significance of a Property.*)

Determine what physical features the property must possess in order for it to reflect the significance of the historic context.

These physical features can be determined after identifying the following:

- Which types of properties are associated with the historic context,
- The ways in which properties can represent the theme, and
- The applicable aspects of integrity.

Properties that have the defined characteristics are eligible for listing. (See *Part VIII: How to Evaluate the Integrity of a Property.*)

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PROPERTIES SIGNIFICANT WITHIN MORE THAN ONE HISTORIC CONTEXT

A specific property can be significant within one or more historic contexts, and, if possible, all of these should be identified. For example, a public building constructed in the 1830s that is related to the historic context of Civil War campaigns in the area might also be related to the theme of political developments in the community during the 1880s. A property is only required, however, to be documented as significant in one context.

COMPARING RELATED PROPERTIES

Properties listed in the National Register must possess significance when evaluated in the perspective of their historic context. Once the historic context is established and the property type is determined, it is not necessary to evaluate the property in question against other properties *if*:

- It is the sole example of a property type that is important in illustrating the historic context or
- It clearly possesses the defined characteristics required to strongly represent the context.

If these two conditions do not apply, then the property will have to be evaluated against other examples of the property type to determine its eligibility. The geographic level (local, State, or national) at which this evaluation is made is the same as the level of the historic context. (See *Part V: How to Evaluate a Property Within Its Historic Context.*)

LOCAL, STATE, AND NATIONAL HISTORIC CONTEXTS

Historic contexts are found at a variety of geographical levels or scales. The geographic scale selected may relate to a pattern of historical development, a political division, or a cultural area. Regardless of the scale, the historic context establishes the framework from which decisions about the significance of related properties can be made.

LOCAL HISTORIC CONTEXTS

A local historic context represents an aspect of the history of a town, city, county, cultural area, or region, or any portions thereof. It is defined by the importance of the property, not necessarily the physical location of the property. For instance, if a property is of a type found throughout a State, or its boundaries extend over two States, but its importance relates only to a particular county, the property would be considered of local significance.

The level of context of archeological sites significant for their information potential depends on the scope of the applicable research design. For example, a Late Mississippian village site may yield information in a research design concerning one settlement system on a regional scale, while in another research design it may reveal information of local importance concerning a single group's stone tool manufacturing techniques or house forms. It is a question of how the available information potential is likely to be used.

STATE HISTORIC CONTEXTS

Properties are evaluated in a State context when they represent an aspect of the history of the State as a whole (or American Samoa, the District of Columbia, the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, or the Virgin Islands). These properties do not necessarily have to belong to property types found throughout the entire State: they can be located in only a portion of the State's present political boundary. It is the property's historic context that must be important statewide. For example, the "cotton belt" extends through only a portion of Georgia, yet its historical development in the antebellum period affected the entire State. These State historic contexts may have associated properties that are statewide or locally significant representations. A cotton gin in a small town might be a locally significant representation of this context, while one of the largest cotton producing plantations might be of State significance.

A property whose historic associations or information potential appears to extend beyond a single local area might be significant at the State level. A property can be significant to more than one community or local area, however, without having achieved State significance.

A property that overlaps several State boundaries can possibly be significant to the State or local history of each of the States. Such a property is not necessarily of national significance, however, nor is it necessarily significant to all of the States in which it is located.

Prehistoric sites are not often considered to have "State" significance, per se, largely because States are relatively recent political entities and usually do not correspond closely to Native American political territories or cultural areas. Numerous sites, however, may be of significance to a large region that might geographically encompass parts of one, or usually several, States. Prehistoric resources that might be of State significance include regional sites that provide a diagnostic assemblage of artifacts for a particular cultural group or time period or that provide chronological control (specific dates or relative order in time) for a series of cultural groups.

NATIONAL HISTORIC CONTEXTS

Properties are evaluated in a national context when they represent an aspect of the history of the United States and its territories as a whole. These national historic contexts may have associated properties that are locally or statewide significant representations, as well as those of national significance.

Properties designated as nationally significant and listed in the National Register are the prehistoric and historic units of the National Park System and those properties that have been designated National Historic Landmarks. The National Historic Landmark criteria are the standards for nationally significant properties; they are found in the *Code of Federal Regulations, Title 36, Part 65* and are summarized in this bulletin in *Part IX: Summary of National Historic Landmarks Criteria for Evaluation.*

A property with national significance helps us understand the history of the nation by illustrating the nationwide impact of events or persons associated with the property, its architectural type or style, or information potential. It must be of exceptional value in representing or illustrating an important theme in the history of the nation.

Nationally significant properties do not necessarily have to belong to a property type found throughout the entire country: they can be located in only a portion of the present political boundaries. It is their historic context that must be important nationwide. For example, the American Civil War was fought in only a portion of the United States, yet its impact was nationwide. The site of a small military skirmish might be a locally significant representation of this national context, while the capture of the State's largest city might be a statewide significant representation of the national context.

When evaluating properties at the national level for designation as a National Historic Landmark, please refer to the National Historic Landmarks outline, *History and Prehistory in the National Park System and the National Historic Landmarks Program 1987.* (For more information about the National Historic Landmarks program, please write to the Department of the Interior, National Park Service, National Historic Landmarks, 1849 C Street, NW, NC400, Washington, DC 20240.)

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VI. HOW TO IDENTIFY THE TYPE OF SIGNIFICANCE OF A PROPERTY

INTRODUCTION

When evaluated within its historic context, a property must be shown to be significant for *one or more of the four Criteria for Evaluation - A, B, C, or D* (listed earlier in *Part II*). The Criteria describe how properties are significant for their association with important events or persons, for their importance in design or construction, or for their information potential.

The basis for judging a property's significance and, ultimately, its eligibility under the Criteria is *historic context*. The use of historic context allows a property to be properly evaluated in a nearly infinite number of capacities. For instance, Criterion C: Design/Construction can accommodate properties representing construction types that are unusual or widely practiced, that are innovative or traditional, that are "high style" or vernacular, that are the work of a famous architect or an unknown master craftsman. *The key to determining whether the characteristics or associations of a particular property are significant is to consider the property within its historic context.*

After identifying the relevant historic context(s) with which the property is associated, the four Criteria are applied to the property. Within the scope of the historic context, the National Register Criteria define the kind of significance that the properties represent.

For example, within the context of "19th Century Gunpowder Production in the Brandywine Valley," Criterion A would apply to those properties associated with important events in the founding and development of the industry. Criterion B would apply to those properties associated with persons who are significant in the founding of the industry or associated with important inventions related to gunpowder manufacturing. Criterion C would apply to those buildings, structures, or objects whose architectural form or style reflect important design qualities integral to the industry. And Criterion D would apply to properties that can convey information important in our understanding of this industrial process. If a property qualifies under more than one of the Criteria, its significance under each should be considered, if possible, in order to identify all aspects of its historical value.

NATIONAL REGISTER CRITERIA FOR EVALUATION*

The National Register Criteria recognize different types of values embodied in districts, sites, buildings, structures, and objects. These values fall into the following categories:

Associative value (Criteria A and B): Properties significant for their association or linkage to events (Criterion A) or persons (Criterion B) important in the past.

Design or Construction value (Criterion C): Properties significant as representatives of the manmade expression of culture or technology.

Information value (Criterion D): Properties significant for their ability to yield important information about prehistory or history.

*For a complete listing of the Criteria for Evaluation, refer to Part II of this bulletin.

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CRITERION A: EVENT

Properties can be eligible for the National Register if they are associated with events that have made a significant contribution to the broad patterns of our history.

UNDERSTANDING CRITERION A: EVENT

To be considered for listing under Criterion A, a property must be associated with one or more events important in the defined historic context. Criterion A recognizes properties associated with single events, such as the founding of a town, or with a pattern of events, repeated activities, or historic trends, such as the gradual rise of a port city's prominence in trade and commerce. The event or trends, however, must clearly be important within the associated context: settlement, in the case of the town, or development of a maritime economy, in the case of the port city. Moreover, the property must have an important association with the event or historic trends, and it must retain historic integrity. (See *Part V: How to Evaluate a Property Within its Historic Context.)*

Several steps are involved in determining whether a property is significant for its associative values:

- Determine the nature and origin of the property,
- Identify the historic context with which it is associated, and
- Evaluate the property's history to determine whether it is associated with the historic context in any important way.

APPLYING CRITERION A: EVENT

TYPES OF EVENTS

A property can be associated with either (or both) of two types of events:

- A specific event marking an important moment in American prehistory or history and
- A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation.

Refer to the sidebar on the right for a list of specific examples.

ASSOCIATION OF THE PROPERTY WITH THE EVENTS

The property you are evaluating must be documented, through accepted means of historical or archeological research (including oral history), to have existed at the time of the event or pattern of events *and* to have been associated with those events. A property is *not* eligible if its associations are speculative. For archeological sites, well reasoned inferences drawn from data recovered at the site can be used to establish the association between the site and the events.

SIGNIFICANCE OF THE ASSOCIATION

Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well. For example, a building historically in commercial use must be shown to have been significant in commercial history.

EXAMPLES OF PROPERTIES ASSOCIATED WITH EVENTS

Properties associated with specific events:

- *The site of a battle.*
- *The building in which an important invention was developed.*
- *A factory district where a significant strike occurred.*
- *An archeological site at which a major new aspect of prehistory was discovered, such as the first evidence of man and extinct Pleistocene animals being contemporaneous.*
- *A site where an important facet of European exploration occurred.*

Properties associated with a pattern of events:

- *A trail associated with western migration.*
- *A railroad station that served as the focus of a community's transportation system and commerce.*
- *A mill district reflecting the importance of textile manufacturing during a given period.*
- *A building used by an important local social organization.*
- *A site where prehistoric Native Americans annually gathered for seasonally available resources and for social interaction.*
- *A downtown district representing a town's growth as the commercial focus of the surrounding agricultural area.*

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TRADITIONAL CULTURAL VALUES

Traditional cultural significance is derived from the role a property plays in a community's historically rooted beliefs, customs, and practices. Properties may have significance under Criterion A if they are associated with events, or series of events, significant to the cultural traditions of a community.[5]

Eligible

- A hilltop associated in oral historical accounts with the founding of an Indian tribe or society is eligible.
- A rural community can be eligible whose organization, buildings, or patterns of land use reflect the cultural traditions valued by its long-term residents.
- An urban neighborhood can be eligible as the traditional home of a particular cultural group and as a reflection of its beliefs and practices.

Not Eligible

- A site viewed as sacred by a recently established utopian or religious community does not have traditional cultural value and is not eligible.



Criterion A - The Old Brulay Plantation, *Brownsville vicinity, Cameron county, Texas. Historically significant for its association with the development of agriculture in southeast Texas, this complex of 10 brick buildings was constructed by George N. Brulay, a French immigrant who introduced commercial sugar production and irrigation to the Rio Grande Valley. (Photo by Texas Historical Commission).*

[5] For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties.*

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CRITERION B: PERSON

Properties may be eligible for the National Register if they are associated with the lives of persons significant in our past.

UNDERSTANDING CRITERION B: PERSON[6]

Criterion B applies to properties associated with individuals whose specific contributions to history can be identified and documented. Persons "significant in our past" refers to individuals whose activities are demonstrably important within a local, State, or national historic context. The criterion is generally restricted to those properties that illustrate (rather than commemorate) a person's important achievements. (The policy regarding commemorative properties, birthplaces, and graves is explained further in *Part VIII: How to Apply the Criteria Considerations.)*

Several steps are involved in determining whether a property is significant for its associative values under Criterion B. First, determine the importance of the individual. Second, ascertain the length and nature of his/her association with the property under study and identify the other properties associated with the individual. Third, consider the property under Criterion B, as outlined below.

EXAMPLES OF PROPERTIES ASSOCIATED WITH PERSONS

Properties associated with a Significant Person:

- *The home of an important merchant or labor leader.*
- *The studio of a significant artist.*
- *The business headquarters of an important industrialist.*



***Criterion B - The William Whitney House,** Hinsdale, DuPage County, Illinois. This building is locally significant for its historical association with William Whitney, the founder of the town of Hinsdale, Illinois. Whitney, a citizen of New York State, moved to Illinois, established the town, and while living here between 1870 and 1879 was a prominent local businessman and politician. (Photo by Frederick C. Cue).*

[6] For further information on properties eligible under Criterion B, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Properties Associated with Significant Persons.*

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APPLYING CRITERION B: PERSON

SIGNIFICANCE OF THE INDIVIDUAL

The persons associated with the property must be *individually* significant within a historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.

Eligible

- The residence of a doctor, a mayor, or a merchant is eligible under Criterion B if the person was significant in the field of medicine, politics, or commerce, respectively.

Not Eligible

- A property is not eligible under Criterion B if it is associated with an individual about whom no scholarly judgement can be made because either research has not revealed specific information about the person's activities and their impact, or there is insufficient perspective to determine whether those activities or contributions were historically important.

ASSOCIATION WITH THE PROPERTY

Properties eligible under Criterion B are usually those associated with a person's *productive* life, reflecting the time period when he or she achieved significance. In some instances this may be the person's home; in other cases, a person's business, office, laboratory, or studio may best represent his or her contribution. Properties that pre- or post-date an individual's significant accomplishments are usually not eligible. (See *Comparison to Related Properties*, below, for exceptions to this rule.)

The individual's association with the property must be documented by accepted methods of historical or archeological research, including written or oral history. Speculative associations are not acceptable. For archeological sites, well reasoned inferences drawn from data recovered at the site are acceptable.

COMPARISON TO RELATED PROPERTIES

Each property associated with an important individual should be compared to other associated properties to identify those that best represent the person's historic contributions. The best representatives usually are properties associated with the person's adult or *productive* life. Properties associated with an individual's formative or later years may also qualify if it can be demonstrated that the person's activities during this period were historically significant *or* if no properties from the person's productive years survives. Length of association is an important factor when assessing several properties with similar associations.

A community or State may contain several properties eligible for associations with the same important person, if each represents a different aspect of the person's productive life. A property can also be eligible if it has brief but consequential associations with an important individual. (Such associations are often related to specific events that occurred at the property and, therefore, it may also be eligible under Criterion A.)

ASSOCIATION WITH GROUPS

For properties associated with several community leaders or with a prominent family, it is necessary to identify specific individuals and to explain their significant accomplishments.

Eligible

- A residential district in which a large number of prominent or influential merchants, professionals, civic leaders, politicians, etc., lived will be eligible under Criterion B if the significance of one or more specific individual residents is explicitly justified.
- A building that served as the seat of an important family is eligible under Criterion B if the significant accomplishments of one or more individual family members is explicitly justified.

Not Eligible

- A residential district in which a large number of influential persons lived is not eligible under Criterion B if the accomplishments of a specific individual(s) cannot be documented. If the significance of the district rests in the cumulative importance of prominent residents, however, then the district might still be eligible under Criterion A. Eligibility, in this case, would be based on the broad pattern of community development, through which the neighborhood evolved into the primary residential area for this class of citizens.
- A building that served as the seat of an important family will not be eligible under Criterion B if the significant accomplishments of individual family members cannot be documented. In cases where a succession of family members have lived in a house and collectively have had a demonstrably significant impact on the community, as a family, the house is more likely to be significant under Criterion A for association with a pattern of events.

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ASSOCIATION WITH LIVING PERSONS

Properties associated with living persons are usually not eligible for inclusion in the National Register. Sufficient time must have elapsed to assess both the person's field of endeavor and his/her contribution to that field. Generally, the person's active participation in the endeavor must be finished for this historic perspective to emerge. (See Criteria Considerations C and G in *Part VII: How to Apply the Criteria Considerations.)*

ASSOCIATION WITH ARCHITECTS/ARTISANS

Architects, artisans, artists, and engineers are often represented by their works, which are eligible under Criterion C. Their homes and studios, however, can be eligible for consideration under Criterion B, because these usually are the properties with which they are most personally associated.

NATIVE AMERICAN SITES

The known major villages of individual Native Americans who were important during the contact period or later can qualify under Criterion B. As with all Criterion B properties, the individual associated with the property must have made some specific important contribution to history. Examples include sites significantly associated with Chief Joseph and Geronimo.[7]

[7] For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties.*

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CRITERION C: DESIGN/CONSTRUCTION

Properties may be eligible for the National Register if they embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.



Richland Plantation, *East Feliciana Parish, Louisiana. Properties can qualify under Criterion C as examples of high style architecture. Built in the 1830s, Richland is a fine example of a Federal style residence with a Greek Revival style portico. (Photo by Dave Gleason).*

UNDERSTANDING CRITERION C: DESIGN/ CONSTRUCTION

This criterion applies to properties significant for their physical design or construction, including such elements as architecture, landscape architecture, engineering, and artwork. To be eligible under Criterion C, a property must meet *at least one* of the following requirements:

- Embody distinctive characteristics of a type, period, or method of construction.
- Represent the work of a master.
- Possess high artistic value.
- Represent a significant and distinguishable entity whose components may lack individual distinction.

The first requirement, that properties "embody the distinctive characteristics of a type, period, or method of construction," refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. "The work of a master" refers to the technical or aesthetic achievements of an architect or craftsman. "High artistic values" concerns the expression of aesthetic ideals or preferences and applies to aesthetic achievement.

Resources "that represent a significant and distinguishable entity whose components may lack individual distinction" are called "districts." In the Criteria for Evaluation (as published in the *Code of Federal Regulations* and reprinted here in Part II), districts are defined within the context of Criterion C. *Districts, however, can be considered for eligibility under all the Criteria,* individually or in any combination, as is appropriate. For this reason, the full discussion of districts is contained in *Part IV: How to Define Categories of Historic Properties.* Throughout the bulletin, however, districts are mentioned within the context of a specific subject, such as an individual Criterion.



Grant Family House*, Saco vicinity, York County, Maine. Properties possessing high artistic value meet Criterion C through the expression of aesthetic ideals or preferences. The Grant Family House, a modest Federal style residence, is significant for its remarkably well-preserved stenciled wall decorative treatment in the entry hall and parlor. Painted by an unknown artist ca. 1825, this is a fine example of 19th century New England regional artistic expression. (Photo by Kirk F. Mohney).*

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EXAMPLES OF PROPERTIES ASSOCIATED WITH DESIGN/ CONSTRUCTION

Properties associated with design and construction:

- *A house or commercial building representing a significant style of architecture.*
- *A designed park or garden associated with a particular landscape design philosophy.*
- *A movie theater embodying high artistic value in its decorative features.*
- *A bridge or dam representing technological advances.*

APPLYING CRITERION C: DESIGN/ CONSTRUCTION

DISTINCTIVE CHARACTERISTICS OF TYPE, PERIOD, AND METHOD OF CONSTRUCTION

This is the portion of Criterion C under which most properties are eligible, for it encompasses all architectural styles and construction practices. To be eligible under this portion of the Criterion, a property must clearly illustrate, through "distinctive characteristics," the following:

- The pattern of features common to a particular class of resources,
- The individuality or variation of features that occurs within the class,
- The evolution of that class, or
- The transition between classes of resources.

Distinctive Characteristics: "Distinctive characteristics" are the physical features or traits that commonly recur in individual types, periods, or methods of construction. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction.

Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials. They can be general, referring to ideas of design and construction such as basic plan or form, or they can be specific, referring to precise ways of combining particular kinds of materials.

Eligible

- A building eligible under the theme of Gothic Revival architecture must have the distinctive characteristics that make up the vertical and picturesque qualities of the style, such as pointed gables, steep roof pitch, board and batten siding, and ornamental bargeboard and veranda trim.
- A late Mississippian village that illustrates the important concepts in prehistoric community design and planning will qualify.
- A designed historic landscape will qualify if it reflects a historic trend or school of theory and practice, such as the City Beautiful Movement, evidencingdistinguished design, layout, and the work of skilled craftsmanship.

Not Eligible

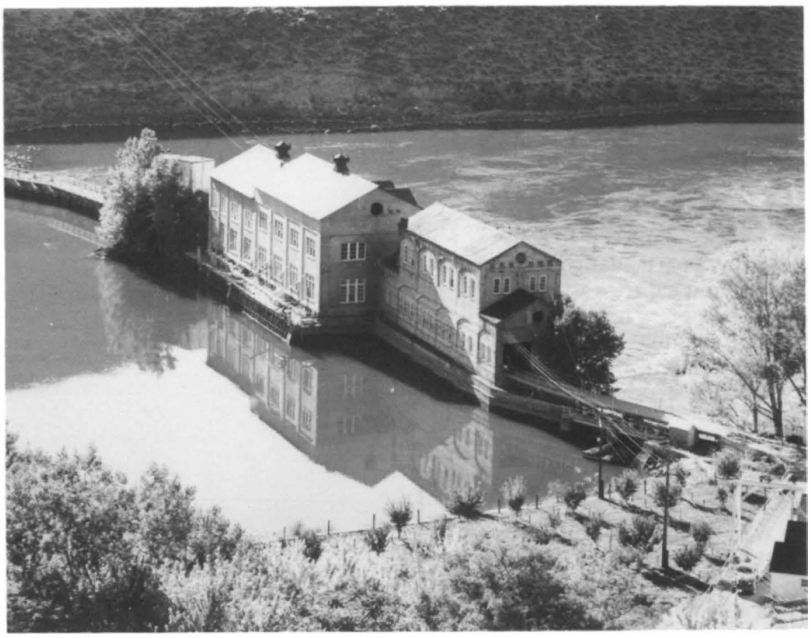
- A commercial building with some Art Deco detailing is not eligible under Criterion C if the detailing was added merely as an afterthought, rather than fully integrated with overall lines and massing typical of the Art Deco style or the transition between that and another style.
- A designed landscape that has had major changes to its historic design, vegetation, original boundary, topography/ grading, architectural features, and circulation system will not qualify.

Type, Period, and Method of Construction: "Type, period, or method of construction" refers to the way certain properties are related to one another by cultural tradition or function, by dates of construction or style, or by choice or availability of materials and technology.

A structure is eligible as a specimen of its type or period of construction if it is an important example (within its context) of building practices of a particular time in history. For properties that represent the variation, evolution, or transition of construction types, it must be demonstrated that the variation, etc., was an important phase of the architectural development of the area or community in that it had an impact as evidenced by later buildings. A property is not eligible, however, simply because it has been identified as the only such property ever fabricated; it must be demonstrated to be significant as well.

Eligible

- A building that has some characteristics of the Romanesque Revival style and some characteristics of the Commercial style can qualify if it illustrates the transition of architectural design and the transition itself is considered an important architectural development.
- A Hopewellian mound, if it is an important example of mound building construction techniques, would qualify as a method or type of construction.
- A building which illustrates the early or the developing technology of particular structural systems, such as skeletal steel framing, is eligible as an example of a particular method of construction.



Swan Falls Dam and Power Plant, *Murphy vicinity, Ada County, Idaho. Significant works of engineering can qualify under Criterion C. Built between 1900-1907 the Swan Falls Dam and Power Plant across the Snake River is one of the early hydroelectric plants in the State of Idaho. (Photo by H.L. Hough).*



Looney House, *Asheville vicinity, St. Clair County, Alabama. Examples of vernacular styles of architecture can qualify under Criterion C. Built ca. 1818, the Looney House is significant as possibly the State's oldest extant two-story dogtrot type of dwelling. The defining open center passage of the dogtrot was a regional building response to the southern climate. (Photo by Carolyn Scott).*

HISTORIC ADAPTATION OF THE ORIGINAL PROPERTY

A property can be significant not only for the way it was originally constructed or crafted, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.

A district is eligible under this guideline if it illustrates the evolution of historic character of a place over a particular span of time.

Eligible

- A Native American irrigation system modified for use by Europeans could be eligible if it illustrates the technology of either or both periods of construction.
- An early 19th century farmhouse modified in the 1880s with Queen Anne style ornamentation could be significant for the modification itself, if it represented a local variation or significant trend in building construction or remodelling, was the work of a local master (see *Works of a Master* on page 20), or reflected the tastes of an important person associated with the property at the time of its alteration.
- A district encompassing the commercial development of a town between 1820 and 1910, characterized by buildings of various styles and eras, can be eligible.

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WORKS OF A MASTER

A master is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft.

A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although it might meet other portions of the Criterion, for instance as a representative of the Prairie style.

The work of an unidentified craftsman is eligible if it rises above the level of workmanship of the other properties encompassed by the historic context.

PROPERTIES POSSESSING HIGH ARTISTIC VALUES

High artistic values may be expressed in many ways, including areas as diverse as community design or planning, engineering, and sculpture. A property is eligible for its high artistic values if it so fully articulates a particular concept of design that it expresses an aesthetic ideal. A property is not eligible, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type.

Eligible

- A sculpture in a town square that epitomizes the design principles of the Art Deco style is eligible.
- A building that is a classic expression of the design theories of the Craftsman Style, such as carefully detailed handwork, is eligible.
- A landscaped park that synthesizes early 20th century principles of landscape architecture and expresses an aesthetic ideal of environment can be eligible.
- Properties that are important representatives of the aesthetic values of a cultural group, such as petroglyphs and ground drawings by Native Americans, are eligible.

Not Eligible

- A sculpture in a town square that is a typical example of sculpture design during its period would not qualify for high artistic value, although it might be eligible if it were significant for other reasons.
- A building that is a modest example (within its historic context) of the Craftsman Style of architecture, or a landscaped park that is characteristic of turn of the century landscape design would not qualify for high artistic value.

A Significant and Distinguishable Entity Whose Components May Lack Individual Distinction. This portion of Criterion C refers to districts. For detailed information on districts, refer to *Part IV* of this bulletin.

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CRITERION D: INFORMATION POTENTIAL

Properties may be eligible for the National Register if they have yielded, or may be likely to yield, information important in prehistory or history.

UNDERSTANDING CRITERION D: INFORMATION POTENTIAL

Certain important research questions about human history can only be answered by the actual physical material of cultural resources. Criterion D encompasses the properties that have the potential to answer, in whole or in part, those types of research questions. The most common type of property nominated under this Criterion is the archeological site (or a district comprised of archeological sites). Buildings, objects, and structures (or districts comprised of these property types), however, can also be eligible for their information potential.

Criterion D has two requirements, which must *both* be met for a property to qualify:

- The property must have, or have had, information to contribute to our understanding of human history or prehistory, and
- The information must be considered important.

Under the first of these requirements, a property is eligible if it has been used as a source of data and contains more, as yet unretrieved data. A property is also eligible if it has not yet yielded information but, through testing or research, is determined a likely source of data.

Under the second requirement, the information must be carefully evaluated within an appropriate context to determine its importance. Information is considered "important" when it is shown to have a significant bearing on a research design that addresses such areas as: 1) current data gaps or alternative theories that challenge existing ones or 2) priority areas identified under a State or Federal agency management plan.

APPLYING CRITERION D: INFORMATION POTENTIAL

ARCHEOLOGICAL SITES

Criterion D most commonly applies to properties that contain or are likely to contain information bearing on an important archeological research question. The property must have characteristics suggesting the likelihood that it possesses configurations of artifacts, soil strata, structural remains, or other natural or cultural features that make it possible to do the following:

- Test a hypothesis or hypotheses about events, groups, or processes in the past that bear on important research questions in the social or natural sciences or the humanities; or
- Corroborate or amplify currently available information suggesting that a hypothesis is either true or false; or
- Reconstruct the sequence of archeological cultures for the purpose of identifying and explaining continuities and discontinuities in the archeological record for a particular area.

BUILDINGS, STRUCTURES, AND OBJECTS

While most often applied to archeological districts and sites, Criterion D can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D, they themselves must be, or must have been, the principal source of the important information.

Eligible

- A building exhibiting a local variation on a standard design or construction technique can be eligible if study could yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development.

Not Eligible

- The ruins of a hacienda once contained murals that have since been destroyed. Historical documentation, however, indicates that the murals were significant for their highly unusual design. The ruins can not be eligible under Criterion D for the importance of the destroyed murals if the information is contained only in the documentation.

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Criterion D - Champe-Fremont 1 Archeological Site, *Omaha vicinity, Douglas County, Nebraska. This archeological site, dating from ca. 1100-1450 A.D., consists of pit houses and storage pits which have the potential to yield important information concerning the subsistence patterns, religious and mortuary practices, and social organization of the prehistoric residents of eastern Nebraska. (Nebraska State Historical Society)*

ASSOCIATION WITH HUMAN ACTIVITY

A property must be associated with *human activity* and be critical for understanding a site's historic environment in order to be eligible under Criterion D. A property can be linked to human activity through events, processes, institutions, design, construction, settlement, migration, ideals, beliefs, lifeways, and other facets of the development or maintenance of cultural systems.

The natural environment associated with the properties was often very different from that of the present and strongly influenced cultural development. Aspects of the environment that are pertinent to human activities should be considered when evaluating properties under Criterion D.

Natural features and paleontological (floral and faunal) sites are not usually eligible under Criterion D in and of themselves. They can be eligible, however, if they are either directly related to human activity or critical to understanding a site's historic environment. In a few cases, a natural feature or site unmarked by cultural materials, that is primarily eligible under Criterion A, may also be eligible under Criterion D, *if* study of the feature, or its location, setting, etc. (usually in the context of data gained from other sources), will yield important information about the event or period with which it is associated.

ESTABLISHING A HISTORIC CONTEXT

The information that a property yields, or will yield, must be evaluated within an appropriate historic context. This will entail consulting the body of information already collected from similar properties or other pertinent sources, including modern and historic written records. The researcher must be able to anticipate if and how the potential information will affect the definition of the context. The information likely to be obtained from a particular property must confirm, refute, or supplement in an important way existing information.

A property is *not* eligible if it cannot be related to a particular time period or cultural group and, as a result, lacks any historic context within which to evaluate the importance of the information to be gained.

DEVELOPING RESEARCH QUESTIONS

Having established the importance of the information that may be recovered, it is necessary to be explicit in demonstrating the connection between the important information and a specific property. One approach is to determine if specific important research questions can be answered by the data contained in the property. Research questions can be related to property-specific issues, to broader questions about a large geographic area, or to theoretical issues independent of any particular geographic location. These questions may be derived from the academic community or from preservation programs at the local, regional, State, or national level. Research questions are usually developed as part of a "research design," which specifies not only the questions to be asked, but also the types of data needed to supply the answers, and often the techniques needed to recover the data.

Eligible

- When a site consisting of a village occupation with midden deposits, hearths, ceramics, and stratified evidence of several occupations is being evaluated, three possible research topics could be: 1) the question of whether the site occupants were indigenous to the area prior to the time of occupation or recent arrivals, 2) the investigation of the settlement-subsistence pattern of the occupants, 3) the question of whether the region was a center for the domestication of plants. Specific questions could include: A) Do the deposits show a sequential development or sudden introduction of Ceramic Type X? B) Do the dates of the occupations fit our expectations based on the current model for the reoccupation behavior of slash-and-burn agriculturalists? C) Can any genetic changes in the food plant remains be detected?

Not Eligible

- A property is not eligible if so little can be understood about it that it is not possible to determine if specific important research questions can be answered by data contained in the property.

ESTABLISHING THE PRESENCE OF ADEQUATE DATA

To support the assertion that a property has the data necessary to provide the important information, the property should be investigated with techniques sufficient to establish the presence of relevant data categories. What constitutes appropriate investigation techniques would depend upon specific circumstances including the property's location, condition, and the research questions being addressed, and could range from surface survey (or photographic survey for buildings), to the application of remote sensing techniques or intensive subsurface testing. Justification of the research potential of a property may be based on analogy to another better known property if sufficient similarities exist to establish the appropriateness of the analogy.

Eligible

- Data requirements depend on the specific research topics and questions to be addressed. To continue the example in "Developing Research Questions" above, we might want to ascertain the following with reference to questions A, B, and C: A) The site contains Ceramic Type X in one or more occupation levels and we expect to be able to document the local evaluation of the type or its intrusive nature. B) The hearths contain datable carbon deposits and are associated with more than one occupation. C) The midden deposits show good floral/faunal preservation, and we know enough about the physical evolution of food plants to interpret signs that suggest domestication.

Not Eligible

- Generally, if the applicable research design requires clearly stratified deposits, then subsurface investigation techniques must be applied. A site composed only of surface materials can not be eligible for its potential to yield information that could only be found in stratified deposits.

INTEGRITY

The assessment of integrity for properties considered for information potential depends on the data requirements of the applicable research design. A property possessing information potential does not need to recall *visually* an event, person, process, or construction technique. It is important that the significant data contained in the property remain sufficiently intact to yield the expected important information, if the appropriate study techniques are employed.

Eligible

- An irrigation system significant for the information it will yield on early engineering practices can still be eligible even though it is now filled in and no longer retains the appearance of an open canal.

Not Eligible

- A plowed archeological site contains several superimposed components that have been mixed to the extent that artifact assemblages cannot be reconstructed. The site cannot be eligible if the data requirements of the research design call for the study of artifacts specific to one component.

PARTLY EXCAVATED OR DISTURBED PROPERTIES

The current existence of appropriate physical remains must be ascertained in considering a property's ability to yield important information. Properties that have been partly excavated or otherwise disturbed and that are being considered for their potential to yield additional important information must be shown to retain that potential in their remaining portions.

Eligible

- A site that has been partially excavated but still retains substantial intact deposits (or a site in which the remaining deposits are small but contain critical information on a topic that is not well known) is eligible.

Not Eligible

- A totally collected surface site or a completely excavated buried site is not eligible since the physical remains capable of yielding important information no longer exist at the site. (See *Completely Excavated Sites*, on page 24, for exception.) Likewise, a site that has been looted or otherwise disturbed to the extent that the remaining cultural materials have lost their important depositional context (horizontal or vertical location of deposits) is not eligible.
- A reconstructed mound or other reconstructed site will generally not be considered eligible, because original cultural materials or context or both have been lost.

COMPLETELY EXCAVATED SITES

Properties that have yielded important information in the past and that no longer retain additional research potential (such as completely excavated archeological sites) must be assessed essentially as historic sites under Criterion A. Such sites must be significant for associative values related to: 1) the importance of the data gained or 2) the impact of the property's role in the history of the development of anthropology/archeology or other relevant disciplines. Like other historic properties, the site must retain the ability to convey its association as the former repository of important information, the location of historic events, or the representative of important trends.

Eligible

- A property that has been excavated is eligible if the data recovered was of such importance that it influenced the direction of research in the discipline, as in a site that clearly established the antiquity of the human occupation of the New World. (See Criterion A in *Part VI: How to Identify the Type of Significance of a Property* and Criteria Consideration G in *Part VII: How to Apply the Criteria Considerations.*)

Not Eligible

- A totally excavated site that at one time yielded important information but that no longer can convey either its historic/prehistoric utilization or significant modern investigation is not eligible.

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VII. HOW TO APPLY THE CRITERIA CONSIDERATIONS

INTRODUCTION

Certain kinds of properties are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past fifty years. These properties *can* be eligible for listing, however, if they meet special requirements, called Criteria Considerations, in addition to meeting the regular requirements (that is, being eligible under one or more of the four Criteria and possessing integrity). *Part VII* provides guidelines for determining which properties must meet these special requirements and for applying each Criteria Consideration.

The Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district. These are the general steps to follow when applying the Criteria Considerations to your property:

- Before looking at the Criteria Considerations, make sure your property meets one or more of the four Criteria for Evaluation and possesses integrity.
- If it does, check the Criteria Considerations (next column) to see if the property is of a type that is usually excluded from the National Register. The sections that follow also list specific examples of properties of each type. If your property clearly *does not* fit one of these types, then it does not need to meet any special requirements.
- If your property *does* fit one of these types, then it must meet the special requirements stipulated for that type in the Criteria Considerations.

CRITERIA CONSIDERATIONS*

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past fifty years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

a. a religious property deriving primary significance from architectural or artistic distinction or historical importance; or

b. a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

c. a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or

d. a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events; or

e. a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

f. a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,

g. a property achieving significance within the past 50 years if it is of exceptional importance.

*The Criteria Considerations are taken from the Criteria for Evaluation, found in the *Code of Federal Regulations, Title 36, Part 60.*

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CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

A religious property is eligible if it derives its primary significance from architectural or artistic distinction or historical importance.

UNDERSTANDING CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

A religious property requires justification on architectural, artistic, or historic grounds to avoid any appearance of judgment by government about the validity of any religion or belief. Historic significance for a religious property cannot be established on the merits of a religious doctrine, but rather, for architectural or artistic values or for important historic or cultural forces that the property represents. A religious property's significance under Criterion A, B, C, or D must be judged in purely secular terms. A religious group may, in some cases, be considered a cultural group whose activities are significant in areas broader than religious history.

Criteria Consideration for Religious Properties applies:

- If the resource was constructed by a religious institution.
- If the resource is presently owned by a religious institution or is used for religious purposes.
- If the resource was owned by a religious institution or used for religious purposes during its Period of Significance.
- If Religion is selected as an Area of Significance.

Examples of Properties that MUST Meet Criteria Consideration A: Religious Properties

- *A historic church where an important non-religious event occurred, such as a speech by Patrick Henry.*
- *A historic synagogue that is significant for architecture.*
- *A private residence is the site of a meeting important to religious history.*
- *A commercial block that is currently owned as an investment property by a religious institution.*
- *A historic district in which religion was either a predominant or significant function during the period of significance.*

Example of Properties that DO NOT Need to Meet Criteria Consideration A: Religious Properties

- *A residential or commercial district that currently contains a small number of churches that are not a predominant feature of the district.*
- *A town meeting hall that serves as the center of community activity and houses a wide variety of public and private meetings, including religious service. The resource is significant for architecture and politics, and the religious function is incidental.*
- *A town hall, significant for politics from 1875 to 1925, that housed religious services during the 1950s. Since the religious function occurred after the Period of Significance, the Criteria Consideration does not apply.*

APPLYING CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

ELIGIBILITY FOR HISTORIC EVENTS

A religious property can be eligible under Criterion A for any of three reasons:

- It is significant under a theme in the history of religion having secular scholarly recognition; or
- It is significant under another historical theme, such as exploration, settlement, social philanthropy, or education; or
- It is significantly associated with traditional cultural values.

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RELIGIOUS HISTORY

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern in the history of religion.

Eligible

- The site of a convention at which a significant denominational split occurred meets the requirements of Criteria Consideration A. Also eligible is a property that illustrates the broad impact of a religious institution on the history of a local area.

Not Eligible

- A religious property cannot be eligible simply because was the place of religious services for a community, or was the oldest structure used by a religious group in a local area.

OTHER HISTORICAL THEMES

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern that is significant in another historic context. A religious property would also qualify if it were significant for its associations that illustrate the importance of a particular religious group in the social, cultural, economic, or political history of the area. Eligibility depends on the importance of the event or broad pattern and the role of the specific property.

Eligible

- A religious property can qualify for its important role as a temporary hospital during the Revolutionary War, or if its school was significant in the history of education in the community.

Not Eligible

- A religious property is not significant in the history of education in a community simply because it had occasionally served as a school.

TRADITIONAL CULTURAL VALUES

When evaluating properties associated with traditional cultures, it is important to recognize that often these cultures do not make clear distinctions between what is secular and what is sacred. Criteria Consideration A is not intended to exclude traditional cultural resources merely because they have religious uses or are considered sacred. A property or natural feature important to a traditional culture's religion and mythology is eligible if its importance has been ethnohistorically documented and if the site can be clearly defined. It is critical, however, that the activities be documented and that the associations not be so diffuse that the physical resource cannot be adequately defined.[8]

Eligible

- A specific location or natural feature that an Indian tribe believes to be its place of origin and that is adequately documented qualifies under Criteria Consideration A.

ELIGIBILITY FOR HISTORIC PERSONS

A religious property can be eligible for association with a person important in religious history, if that significance has scholarly, secular recognition or is important in other historic contexts. Individuals who would likely be considered significant are those who formed or significantly influenced an important religious institution or movement, or who were important in the social, economic, or political history of the area. Properties associated with individuals important only within the context of a single congregation and lacking importance in any other historic context would not be eligible under Criterion B.

Eligible

- A religious property strongly associated with a religious leader, such as George Whitefield or Joseph Smith, is eligible.

[8] For more information on applying Criteria Consideration A to traditional cultural properties, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties.*

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ELIGIBILITY FOR ARCHITECTURAL OR ARTISTIC DISTINCTION

A religious property significant for its architectural design or construction should be evaluated as are other properties under Criterion C; that is, it should be evaluated within an established architectural context and, if necessary, compared to other properties of its type, period, or method of construction. (See "Comparing Related Properties" in *Part V: How to Evaluate a Property Within Its Historic Context.)*

Eligible

- A historic camp meeting district that meets the requirements of Criterion C for its significance as a type of construction is eligible.

ELIGIBILITY FOR INFORMATION POTENTIAL

A religious property, whether a district, site, building, structure, or object, is eligible if it can yield important information about the religious practices of a cultural group or other historic themes. This kind of property should be evaluated as are other properties under Criterion D, in relation to similar properties, other information sources, and existing data gaps.

Eligible

- A 19th century camp meeting site that could provide information about the length and intensity of site use during revivals of the Second Great Awakening is eligible.
- Rock cairns or medicine wheels that had a historic religious mythological function and can provide information about specific cultural beliefs are eligible.

ABILITY TO REFLECT HISTORIC ASSOCIATIONS

As with all eligible properties, religious properties must physically represent the period of time for which they are significance. For instance, a recent building that houses an older congregation cannot qualify based on the historic activities of the group because the current building does not convey the earlier history. Likewise, an older building that housed the historic activities of the congregation is eligible if it still physically represents the period of the congregation's significance. However, if an older building has been remodeled to the extent that its appearance dates from the time of the remodeling, it can only be eligible if the period of significance corresponds with the period of the alterations.

Eligible

- A church built in the 18th century and altered beyond recognition in the 19th century is eligible only if the additions are important in themselves as an example of late 19th century architecture or as a reflection of an important period of the congregation's growth.

Not Eligible

- A synagogue built in the 1920s cannot be eligible for the important activities of its congregation in the 18th and 19th centuries. It can only be eligible for significance obtained after its construction date.
- A rural 19th century frame church recently sheathed in brick is not eligible because it has lost its characteristic appearance and therefore can no longer convey its 19th century significance, either for architectural value or historic association.



Criteria Consideration A - Religious Properties. *A religious property can qualify as an exception to the Criteria if it is architecturally significant.* ***The Church of the Navity*** *in Rosedale, Iberville Parish, Louisiana, qualified as a rare example in the State of a 19th century small frame Gothic Revival style chapel. (Robert Obier)*

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CRITERIA CONSIDERATION B: MOVED PROPERTIES

A property removed from its original or historically significant location can be eligible if it is significant primarily for architectural value or it is the surviving property most importantly associated with a historic person or event.

UNDERSTANDING CRITERIA CONSIDERATION B: MOVED PROPERTIES

The National Register criteria limit the consideration of moved properties because significance is embodied in locations and settings as well as in the properties themselves. Moving a property destroys the relationships between the property and its surroundings and destroys associations with historic events and persons. A move may also cause the loss of historic features such as landscaping, foundations, and chimneys, as well as loss of the potential for associated archeological deposits. Properties that were moved *before* their period of significance do not need to meet the special requirements of Criteria Consideration B.

One of the basic purposes of the National Register is to encourage the preservation of historic properties as living parts of their communities. In keeping with this purpose, it is not usual to list artificial groupings of buildings that have been created for purposes of interpretation, protection, or maintenance. Moving buildings to such a grouping destroys the integrity of location and setting, and can create a false sense of historic development.

APPLYING CRITERIA CONSIDERATION B: MOVED PROPERTIES

ELIGIBILITY FOR ARCHITECTURAL VALUE

A moved property significant under Criterion C must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association.

Examples of Properties that MUST Meet Criteria Consideration B: Moved Properties

- *A resource moved from one location on its original site to another location on the property, during or after its Period of Significance.*
- *A district in which a significant number of resources have been moved from their original location.*
- *A district which has one moved building that makes an especially significant contribution to the district.*
- *A portable resource, such as a ship or railroad car, that is relocated to a place incompatible with its original function.*
- *A portable resource, such as a ship or railroad car, whose importance is critically linked to its historic location or route and that is moved.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration B: Moved Properties

- *A property that is moved prior to its Period of Significance.*
- *A district in which only a small percentage of typical buildings in a district are moved.*
- *A moved building that is part of a complex but is of less significance than the remaining (unmoved) buildings.*
- *A portable resource, such as a ship or railroad car, that is eligible under Criterion C and is moved within its natural setting (water, rails, etc.).*
- *A property that is raised or lowered on its foundations.*

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ELIGIBILITY FOR HISTORIC ASSOCIATIONS

A moved property significant under Criteria A or B must be demonstrated to be the surviving property most importantly associated with a particular historic event or an important aspect of a historic person's life. The phrase "most importantly associated" means that it must be the single surviving property that is most closely associated with the event or with the part of the person's life for which he or she is significant.

Eligible

- A moved building occupied by an business woman during the majority of her productive career would be eligible if the other extant properties are a house she briefly inhabited prior to her period of significance and a commercial building she owned after her retirement.

Not Eligible

- A moved building associated with the beginning of rail transportation in a community is not eligible if the original railroad station and warehouse remained intact on their original sites.

SETTING AND ENVIRONMENT

In addition to the requirements above, moved properties must still have an orientation, setting, and general environment that are comparable to those of the historic location and that are compatible with the property's significance.

Eligible

- A property significant as an example of mid-19th century rural house type can be eligible after a move, provided that it is placed on a lot that is sufficient in size and character to recall the basic qualities of the historic environment and setting, and provided that the building is sited appropriately in relation to natural and manmade surroundings.

Not Eligible

- A rural house that is moved into an urban area and a bridge that is no longer situated over a waterway are not eligible.

ASSOCIATION DEPENDENT ON THE SITE

For a property whose design values or historical associations are directly dependent on its location, any move will cause the property to lose its integrity and prevent it from conveying its significance.

Eligible

- A farm structure significant only as an example of a method of construction peculiar to the local area is still eligible if it is moved within that local area and the new setting is similar to that of the original location.

Not Eligible

- A 19th century rural residence that was designed around particular topographic features, reflecting that time period's ideals of environment, is not eligible if moved.

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PROPERTIES DESIGNED TO BE MOVED

A property designed to move or a property frequently moved during its historic use must be located in a historically appropriate setting in order to qualify, retaining its integrity of setting, design, feeling, and association. Such properties include automobiles, railroad cars and engines, and ships.

Eligible

- A ship docked in a harbor, a locomotive on tracks or in a railyard, and a bridge relocated from one body of water to another are eligible.

Not Eligible

- A ship on land in a park, a bridge placed in a pasture, or a locomotive displayed in an indoor museum are not eligible.

ARTIFICIALLY CREATED GROUPINGS

An artificially created grouping of buildings, structures, or objects is not eligible unless it has achieved significance since the time of its assemblage. It cannot be considered as a reflection of the time period when the individual buildings were constructed.

Eligible

- A grouping of moved historic buildings whose creation marked the beginning of a major concern with past lifestyles can qualify as an early attempt at historic preservation and as an illustration of that generation's values.

Not Eligible

- A rural district composed of a farmhouse on its original site and a grouping of historic barns recently moved onto the property is not eligible.

PORTIONS OF PROPERTIES

A moved *portion* of a building, structure, or object is not eligible because, as a fragment of a larger resource, it has lost integrity of design, setting, materials, workmanship, and location.

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CRITERIA CONSIDERATION C: BIRTHPLACES OR GRAVES

A birthplace or grave of a historical figure is eligible if the person is of outstanding importance and if there is no other appropriate site or building directly associated with his or her productive life.

UNDERSTANDING CRITERIA CONSIDERATION C: BIRTHPLACES AND GRAVES

Birthplaces and graves often attain importance as reflections of the origins of important persons or as lasting memorials to them. The lives of persons significant in our past normally are recognized by the National Register through listing of properties illustrative of or associated with that person's productive life's work. Birthplaces and graves, as properties that represent the beginning and the end of the life of distinguished individuals, may be temporally and geographically far removed from the person's significant activities, and therefore are not usually considered eligible.

Examples of Properties that MUST Meet Criteria Consideration C: Birthplaces and Graves

- *The birthplace of a significant person who lived elsewhere during his or her Period of Significance.*
- *A grave that is nominated for its association with the significant person buried in it.*
- *A grave that is nominated for information potential.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration C: Birthplaces and Graves

- *A house that was inhabited by a significant person for his or her entire lifetime.*
- *A grave located on the grounds of the house where a significant person spent his or her productive years.*

APPLYING CRITERIA CONSIDERATION C: BIRTHPLACES AND GRAVES

PERSONS OF OUTSTANDING IMPORTANCE

The phrase "a historical figure of outstanding importance" means that in order for a birthplace or grave to qualify, it cannot be simply the birthplace or grave of a person significant in our past (Criterion B). It must be the birthplace or grave of an individual who was of outstanding importance in the history of the local area, State, or nation. The birthplace or grave of an individual who was one of several people active in some aspect of the history of a community, a state, or the Nation would not be eligible.

LAST SURVIVING PROPERTY ASSOCIATED WITH A PERSON

When an geographical area strongly associated with a person of outstanding importance has lost all other properties directly associated with his or her formative years or productive life, a birthplace or grave may be eligible.

ELIGIBILITY FOR OTHER ASSOCIATIONS

A birthplace or grave can also be eligible if it is significant for reasons other than association with the productive life of the person in question. It can be eligible for significance under Criterion A for association with important events, under Criterion B for association with the productive lives of *other* important persons, or under Criterion C for architectural significance. A birthplace or grave can also be eligible in rare cases if, after the passage of time, it is significant for its commemorative value. (See Criteria Consideration F for a discussion of commemorative properties.) A birthplace or grave can also be eligible under Criterion D if it contains important information on research, *e.g.,* demography, pathology, mortuary practices, socioeconomic status differentiation.



***Criteria Consideration** C - **Birthplaces.** A birthplace of a historical figure is eligible if the person is of outstanding importance and there is no other appropriate site or building associated with his or her productive life. The **Walter Reed Birthplace,** Gloucester vicinity, Gloucester County, Virginia is the most appropriate remaining building associated with the life of the man who, in 1900, discovered the cause and mode of transmission of the great scourge of the tropics, yellow fever. (Virginia Historic Landmarks Commission)*

CRITERIA CONSIDERATION D: CEMETERIES

A cemetery is eligible if it derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events.

UNDERSTANDING CRITERIA CONSIDERATION D: CEMETERIES

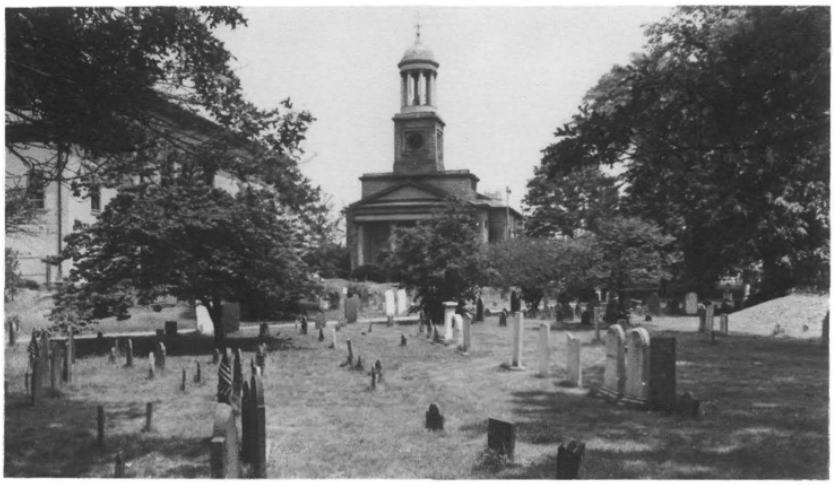
A cemetery is a collection of graves that is marked by stones or other artifacts or that is unmarked but recognizable by features such as fencing or depressions, or through maps, or by means of testing. Cemeteries serve as a primary means of an individual's recognition of family history and as expressions of collective religious and/or ethnic identity. Because cemeteries may embody values beyond personal or family-specific emotions, the National Register criteria allow for listing of cemeteries under certain conditions.

Examples of Properties that MUST Meet Criteria Consideration D: Cemeteries

- *A cemetery that is nominated individually for Criterion A, B, or C.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration D: Cemeteries

- *A cemetery that is nominated along with its associated church, but the church is the main resource nominated.*
- *A cemetery that is nominated under Criterion D for information potential.*
- *A cemetery that is nominated as part of a district but is not the focal point of the district.*



Criteria Consideration D - Cemeteries. *The* ***Hancock Cemetery,*** *Quincy, Norfolk County, Massachusetts meets the exception to the Criteria because it derives its primary significance from its great age (the earliest burials date from 1640) and from the distinctive design features found in its rich collection of late 17th and early 18th century funerary art. (N. Hobart Holly)*

APPLYING CRITERIA CONSIDERATION D: CEMETERIES

PERSONS OF TRANSCENDENT IMPORTANCE

A cemetery containing the graves of persons of transcendent importance may be eligible. To be of transcendent importance the persons must have been of great eminence in their fields of endeavor or had a great impact upon the history of their community, State, or nation. (A single grave that is the burial place of an important person and is located in a larger cemetery that does not qualify under this Criteria Consideration should be treated under Criteria Consideration C: Birthplaces and Graves.)

Eligible

- A historic cemetery containing the graves of a number of persons who were exceptionally significant in determining the course of a State's political or economic history during a particular period is eligible.

Not Eligible

- A cemetery containing graves of State legislators is not eligible if they simply performed the daily business of State government and did not have an outstanding impact upon the nature and direction of the State's history.

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ELIGIBILITY ON THE BASIS OF AGE

Cemeteries can be eligible if they have achieved historic significance for their relative great age in a particular geographic or cultural context.

Eligible

- A cemetery dating from a community's original 1830s settlement can attain significance from its association with that very early period.

ELIGIBILITY FOR DESIGN

Cemeteries can qualify on the basis of distinctive design values. These values refer to the same design values addressed in Criterion C and can include aesthetic or technological achievement in the fields of city planning, architecture, landscape architecture, engineering, mortuary art, and sculpture. As for all other nominated properties, a cemetery must clearly express its design values and be able to convey its historic appearance.

Eligible

- A Victorian cemetery is eligible if it clearly expresses the aesthetic principles related to funerary design for that period, through such features as the overall plan, landscaping, statuary, sculpture, fencing, buildings, and grave markers.

Not Eligible

- A cemetery cannot be eligible for design values if it no longer conveys its historic appearance because of the introduction of new grave markers.

ELIGIBILITY FOR ASSOCIATION WITH EVENTS

Cemeteries may be associated with historic events including specific important events or general events that illustrate broad patterns.

Eligible

- A cemetery associated with an important Civil War battle is eligible.
- A cemetery associated with the settlement of an area by an ethnic or cultural group is eligible if the movement of the group into the area had an important impact, if other properties associated with that group are rare, and if few documentary sources have survived to provide information about the group's history.

Not Eligible

- A cemetery associated with a battle in the Civil War does not qualify if the battle was not important in the history of the war.
- A cemetery associated with an area's settlement by an ethnic or cultural group is not eligible if the impact of the group on the area cannot be established, if other extant historic properties better convey association with the group, or if the information that the cemetery can impart is available in documentary sources.

ELIGIBILITY FOR INFORMATION POTENTIAL

Cemeteries, both historic and prehistoric, can be eligible if they have the potential to yield important information. The information must be important within a specific context and the potential to yield information must be demonstrated.

A cemetery can qualify if it has potential to yield important information provided that the information it contains is not available in extant documentary evidence.

Eligible

- A cemetery associated with the settlement of a particular cultural group will qualify if it has the potential to yield important information about subjects such as demography, variations in mortuary practices, or the study of the cause of death correlated with nutrition or other variables.

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INTEGRITY

Assessing the integrity of a historic cemetery entails evaluating principal design features such as plan, grave markers, and any related elements (such as fencing). Only that portion of a historic cemetery that retains its historic integrity can be eligible. If the overall integrity has been lost because of the number and size of recent grave markers, some features such as buildings, structures, or objects that retain integrity may be considered as individual properties if they are of such historic or artistic importance that they individually meet one or more of the requirements listed above.

NATIONAL CEMETERIES

National Cemeteries administered by the Veterans Administration are eligible because they have been designated by Congress as primary memorials to the military history of the United States. Those areas within a designated national cemetery that have been used or prepared for the reception of the remains of veterans and their dependents, as well as any landscaped areas that immediately surround the graves may qualify. Because these cemeteries draw their significance from the presence of the remains of military personnel who have served the country throughout its history, the age of the cemetery is not a factor in judging eligibility, although integrity must be present.

A national cemetery or a portion of a national cemetery that has only been set aside for use in the future is not eligible.

CRITERIA CONSIDERATION E: RECONTRUCTED PROPERTIES

A reconstructed property is eligible when it is accurately executed in a suitable environment *and* presented in a dignified manner as part of a restoration master plan *and* when no other building or structure with the same associations has survived. All three of these requirements must be met.

UNDERSTANDING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

"Reconstruction" is defined as the reproduction of the exact form and detail of a vanished building, structure, object, or a part thereof, as it appeared at a specific period of time. Reconstructed buildings fall into two categories: buildings wholly constructed of new materials and buildings reassembled from some historic and some new materials. Both categories of properties present problems in meeting the integrity requirements of the National Register criteria.

Examples of Properties that MUST Meet Criteria Consideration E: Reconstructed Properties

- *A property in which most or all of the fabric is not original.*
- *A district in which an important resource or a significant number of resources are reconstructions.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration E: Reconstructed Properties

- *A property that is remodeled or renovated and still has the majority of its original fabric.*

APPLYING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

ACCURACY OF THE RECONSTRUCTION

The phrase "accurately executed" means that the reconstruction must be based upon sound archeological, architectural, and historic data concerning the historic construction and appearance of the resource. That documentation should include both analysis of any above or below ground material and research in written and other records.

SUITABLE ENVIRONMENT

The phrase "suitable environment" refers to: 1) the physical context provided by the historic district and 2) any interpretive scheme, if the historic district is used for interpretive purposes. This means that the reconstructed property must be located at the same site as the original. It must also be situated in its original grouping of buildings, structures, and objects (as many as are extant), and that grouping must retain integrity. In addition, the reconstruction must not be misrepresented as an authentic historic property.

Eligible

- A reconstructed plantation manager's office building is considered eligible because it is located at its historic site, grouped with the remaining historic plantation buildings and structures, and the plantation as a whole retains integrity. Interpretation of the plantation district includes an explanation that the manager's office is not the original building, but a reconstruction.

Not Eligible

- The same reconstructed plantation manager's office building would not qualify if it were rebuilt at a location different from that of the original building, or if the district as a whole no longer reflected the period for which it is significant, or if a misleading interpretive scheme were used for the district or for the reconstruction itself.

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RESTORATION MASTER PLANS

Being presented "as part of a restoration master plan" means that: 1) a reconstructed property is an essential component in a historic district and 2) the reconstruction is part of an overall restoration plan for an entire district. "Restoration" is defined as accurately recovering the form and details of a property and its setting as it appeared at a particular period by removing later work or by replacing missing earlier work (as opposed to completely rebuilding the property). The master plan for the entire property must emphasize restoration, not reconstruction. In other words, the master plan for the entire resource would not be acceptable under this consideration if it called for reconstruction of a majority of the resource.

Eligible

- A reconstructed plantation manager's office is eligible if the office were an important component of the plantation *and* if the reconstruction is one element in an overall plan for restoring the plantation *and* if no other building or structure with the same associations has survived.
- The reconstruction of the plantation manager's office building can be eligible only if the majority of buildings, structures, and objects that comprised the plantation are extant and are being restored. For guidance regarding restoration see the *Secretary of the Interior's Standards for Historic Preservation Projects.*

LAST SURVIVING PROPERTY OF A TYPE

This consideration also stipulates that a reconstruction can qualify if, in addition to the other requirements, no other building, object, or structure with the same association has survived. A reconstruction that is part of a restoration master plan is appropriate only if: 1) the property is the only one in the district with which a particular important activity or event has been historically associated or 2) no other property with the same associative values has survived.

RECONSTRUCTIONS OLDER THAN FIFTY YEARS

After the passage of fifty years, a reconstruction may attain its own significance for what it reveals about the period in which it was built, rather than the historic period it was intended to depict. On that basis, a reconstruction can possibly qualify under any of the Criteria.

CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

A property primarily commemorative in intent can be eligible if design, age, tradition, or symbolic value has invested it with its own historical significance.

UNDERSTANDING CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

Commemorative properties are designed or constructed after the occurrence of an important historic event or after the life of an important person. They are not directly associated with the event or with the person's productive life, but serve as evidence of a later generation's assessment of the past. Their significance comes from their value as cultural expressions at the date of their creation. Therefore, a commemorative property generally must be over fifty years old and must possess significance based on its own value, not on the value of the event or person being memorialized.

Examples of Properties that MUST Meet Criteria Consideration F: Commemorative Properties

- *A property whose sole or primary function is commemorative or in which the commemorative function is of primary significance.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration F: Commemorative Properties

- *A resource that has a non-commemorative primary function or significance.*
- *A single marker that is a component of a district (whether contributing or non-contributing).*

APPLYING CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

ELIGIBILITY FOR DESIGN

A commemorative property derives its design from the aesthetic values of the period of its creation. A commemorative property, therefore, may be significant for the architectural, artistic, or other design qualities of its own period in prehistory or history.

Eligible

- A commemorative statue situated in a park or square is eligible if it expresses the aesthetics or craftsmanship of the period when it was made, meeting Criterion C.
- A late 19th century statue erected on a courthouse square to commemorate Civil War veterans would qualify if it reflects that era's shared perception of the noble character and valor of the veterans and their cause. This was commonly conveyed by portraying idealized soldiers or allegorical figures of battle, victory, or sacrifice.

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ELIGIBILITY FOR AGE, TRADITION, OR SYMBOLIC VALUE

A commemorative property cannot qualify for association with the event or person it memorializes. A commemorative property may, however, acquire significance after the time of its creation through *age, tradition,* or *symbolic* value. This significance must be documented by accepted methods of historical research, including written or oral history, and must meet one or more of the Criteria.

Eligible

- A commemorative marker erected by a cultural group that believed the place was the site of its origins is eligible if, for subsequent generations of the group, the marker itself became the focus of traditional association with the group's historic identity.
- A building erected as a monument to an important historical figure will qualify if through the passage of time the property itself has come to symbolize the value placed upon the individual and is widely recognized as a reminder of enduring principles or contributions valued by the generation that erected the monument.
- A commemorative marker erected early in the settlement or development of an area will qualify if it is demonstrated that, because of its relative great age, the property has long been a part of the historic identity of the area.

Not Eligible

- A commemorative marker erected in the past by a cultural group at the site of an event in its history would not be eligible if the marker were significant only for association with the event, and it had not become significant itself through tradition.
- A building erected as a monument to an important historical figure would not be eligible if its only value lay in its association with the individual, and it has not come to symbolize values, ideas, or contributions valued by the generation that erected the monument.
- A commemorative marker erected to memorialize an event in the community's history would not qualify simply for its association with the event it memorialized.

INELIGIBILITY AS THE LAST REPRESENTATIVE OF AN EVENT OR PERSON

The loss of properties directly associated with a significant event or person does not strengthen the case for consideration of a commemorative property. Unlike birthplaces and graves, a commemorative property usually has no direct historic association. The commemorative property can qualify for historic association only if it is clearly significant in its own right, as stipulated above.

CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS[9]

A property achieving significance within the last fifty years is eligible if it is of exceptional importance.

UNDERSTANDING CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS

The National Register Criteria for Evaluation exclude properties that achieved significance within the last fifty years unless they are of exceptional importance. Fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance. This consideration guards against the listing of properties of passing contemporary interest and ensures that the National Register is a list of truly historic places.

Examples of Properties that MUST Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- *A property that is less than fifty years old.*
- *A property that continues to achieve significance into a period less than fifty years before the nomination.*
- *A property that has non-contiguous Periods of Significance, one of which is less than fifty years before the nomination.*
- *A property that is more than fifty years old and had no significance until a period less than fifty years before the nomination.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- *A resource whose construction began over fifty years ago, but the completion overlaps the fifty year period by a few years or less.*
- *A resource that is significant for its plan or design, which is over fifty years old, but the actual completion of the project overlaps the fifty year period by a few years.*
- *A historic district in which a few properties are newer than fifty years old, but the majority of properties and the most important Period of Significance are greater than fifty years old.*

[9] For more information on Criteria Consideration G, refer to *National Register Bulletin: Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Last Fifty Years.*

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APPLYING CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE PAST FIFTY YEARS

ELIGIBILITY FOR EXCEPTIONAL IMPORTANCE

The phrase "exceptional importance" may be applied to the extraordinary importance of an event or to an entire category of resources so fragile that survivors of any age are unusual. Properties listed that had attained significance in less than fifty years include: the launch pad at Cape Canaveral from which men first traveled to the moon, the home of nationally prominent playwright Eugene O'Neill, and the Chrysler Building (New York) significant as the epitome of the "Style Moderne" architecture.

Properties less than fifty years old that qualify as exceptional because the entire category of resources is fragile include a recent example of a traditional sailing canoe in the Trust Territory of the Pacific Islands, where because of rapid deterioration of materials, no working Micronesian canoes exist that are more than twenty years old. Properties that by their nature can last more than fifty years cannot be considered exceptionally important because of the fragility of the class of resources.

The phrase "exceptional importance" does not require that the property be of national significance. It is a measure of a property's importance within the appropriate historic context, whether the scale of that context is local, State, or national.

Eligible

- The General Laundry Building in New Orleans, one of the few remaining Art Deco Style buildings in that city, was listed in the National Register when it was forty years old because of its exceptional importance as an example of that architectural style.

HISTORICAL PERSPECTIVE

A property that has achieved significance within the past fifty years can be evaluated only when sufficient historical perspective exists to determine that the property is exceptionally important. The necessary perspective can be provided by scholarly research and evaluation, and must consider both the historic context and the specific property's role in that context.

In many communities, properties such as apartment buildings built in the 1950s cannot be evaluated because there is no scholarly research available to provide an overview of the nature, role, and impact of that building type within the context of historical and architectural developments of the 1950s.

NATIONAL PARK SERVICE RUSTIC ARCHITECTURE

Properties such as structures built in a rustic style by the National Park Service during the 1930s and 1940s can be evaluated because a broad study, *National Park Service Rustic Architecture* (1977), provides the context for evaluating properties of this type and style. Specific examples were listed in the National Register prior to reaching fifty years of age when documentation concerning the individual properties established their significance within the historical and architectural context of the type and style.

VETERANS ADMINISTRATION HOSPITALS

Hospitals less than fifty years old that were constructed by the Veterans Bureau and Veterans Administration can be evaluated because the collection of forty-eight facilities built between 1920 and 1946 has been analyzed in a study prepared by the agency. The study provided a historic and architectural context for development of veteran's care within which hospitals could be evaluated. The exceptional importance of specific individual facilities constructed within the past fifty years could therefore be determined based on their role and their present integrity.

COMPARISON WITH RELATED PROPERTIES

In justifying exceptional importance, it is necessary to identify other properties within the geographical area that reflect the same significance or historic associations and to determine which properties *best* represent the historic context in question. Several properties in the area could become eligible with the passage of time, but few will qualify now as exceptionally important.

POST-WORLD WAR II PROPERTIES

Properties associated with the post-World War II era must be identified and evaluated to determine which ones in an area could be judged exceptionally important. For example, a public housing complex may be eligible as an outstanding expression of the nation's post-war urban policy. A military installation could be judged exceptionally important because of its contribution to the Cold War arms race. A church building in a Southern city may have served as the pivotal rallying point for the city's most famous civil rights protest. A post-war suburban subdivision may be the best reflection of contemporary siting and design tenets in a metropolitan area. In each case, the nomination preparer must justify the *exceptional* importance of the property relative to similar properties in the community, State, or nation.

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ELIGIBILITY FOR INFORMATION POTENTIAL

A property that has achieved significance within the past fifty years can qualify under Criterion D only if it can be demonstrated that the information is of exceptional importance within the appropriate context and that the property contains data superior to or different from those obtainable from other sources, including other culturally related sites. An archeological site less than fifty years old may be eligible if the former inhabitants are so poorly documented that information about their lifeways is best obtained from examination of the material remains.

Eligible

- Data such as the rate of adoption of modern technological innovations by rural tenant farmers in the 1950s may not be obtainable through interviews with living persons but could be gained by examination of homesites.

Not Eligible

- A recent archeological site such as the remains of a Navajo sheep corral used in the 1950s would not be considered exceptionally significant for its information potential on animal husbandry if better information on the same topic is available through ethnographic studies or living informants.

HISTORIC DISTRICTS

Properties which have achieved significance within the past fifty years can be eligible for the National Register if they are an integral part of a district which qualifies for National Register listing. This is demonstrated by documenting that the property dates from within the district's defined Period of Significance and that it is associated with one or more of the district's defined Areas of Significance.

Properties less than fifty years old may be an integral part of a district when there is sufficient perspective to consider the properties as historic. This is accomplished by demonstrating that: 1) the district's Period of Significance is justified as a discrete period with a defined beginning and end, 2) the character of the district's historic resources is clearly defined and assessed, 3) specific resources in the district are demonstrated to date from that discrete era, and 4) the majority of district properties are over fifty years old. In these instances, it is not necessary to prove exceptional importance of either the district itself or the less-than-fifty-year-old properties. Exceptional importance still must be demonstrated for district where the majority of properties or the major Period of Significance is less than fifty years old, and for less-than-fifty-year-old properties which are nominated individually.

PROPERTIES MORE THAN FIFTY YEARS IN AGE, LESS THAN FIFTY YEARS IN SIGNIFICANCE

Properties that are more than fifty years old, but whose significant associations or qualities are less than fifty years old, must be treated under the fifty year consideration.

Eligible

- A building constructed early in the twentieth century (and having no architectural importance), but that was associated with an important person during the 1950s, must be evaluated under Criteria Consideration G because the Period of Significance is within the past fifty years. Such a property would qualify if the person was of exceptional importance.

REQUIREMENT TO MEET THE CRITERIA, REGARDLESS OF AGE

Properties that are less than fifty years old and are not exceptionally important will *not* automatically qualify for the National Register once they are fifty years old. In order to be listed in the National Register, all properties, regardless of age, must be demonstrated to meet the Criteria for Evaluation.

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VIII. HOW TO EVALUATE THE INTEGRITY OF A PROPERTY

INTRODUCTION

Integrity is the ability of a property to convey its significance. To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance.

Historic properties either retain integrity (this is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognizes seven aspects or qualities that, in various combinations, define integrity.

To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining *which* of these aspects are most important to a particular property requires knowing why, where, and when the property is significant. The following sections define the seven aspects and explain how they combine to produce integrity.

SEVEN ASPECTS OF INTEGRITY

- Location
- Design
- Setting
- Materials
- Workmanship
- Feeling
- Association

UNDERSTANDING THE ASPECTS OF INTEGRITY

LOCATION

Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved. (See Criteria Consideration B in *Part VII: How to Apply the Criteria Considerations*, for the conditions under which a moved property can be eligible.)

DESIGN

Design is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials.

A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.

Design can also apply to districts, whether they are important primarily for historic association, architectural value, information potential, or a combination thereof. For districts significant primarily for historic association or architectural value, design concerns more than just the individual buildings or structures located within the boundaries. It also applies to the way in which buildings, sites, or structures are related: for example, spatial relationships between major features; visual rhythms in a streetscape or landscape plantings; the layout and materials of walkways and roads; and the relationship of other features, such as statues, water fountains, and archeological sites.

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SETTING

Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historical role. It involves *how*, not just where, the property is situated and its relationship to surrounding features and open space.

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as:

- Topographic features (a gorge or the crest of a hill);
- Vegetation;
- Simple manmade features (paths or fences); and
- Relationships between buildings and other features or open space.

These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its *surroundings*. This is particularly important for districts.

MATERIALS

Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area's sense of time and place.

A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved. The property must also be an actual historic resource, not a recreation; a recent structure fabricated to look historic is not eligible. Likewise, a property whose historic features and materials have been lost and then reconstructed is usually not eligible. (See Criteria Consideration E in *Part VII: How to Apply the Criteria Considerations* for the conditions under which a reconstructed property can be eligible.)

WORKMANSHIP

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques.

Workmanship is important because it can furnish evidence of the technology of a craft, illustrate the aesthetic principles of a historic or prehistoric period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principles. Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery. Examples of workmanship in prehistoric contexts include Paleo-Indian clovis projectile points; Archaic period beveled adzes; Hopewellian birdstone pipes; copper earspools and worked bone pendants; and Iroquoian effigy pipes.

FEELING

Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character. For example, a rural historic district retaining original design, materials, workmanship, and setting will relate the feeling of agricultural life in the 19th century. A grouping of prehistoric petroglyphs, unmarred by graffiti and intrusions and located on its original isolated bluff, can evoke a sense of tribal spiritual life.

ASSOCIATION

Association is the direct link between an important historic event or person and a historic property. A property retains association if it *is* the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. For example, a Revolutionary War battlefield whose natural and manmade elements have remained intact since the 18th century will retain its quality of association with the battle.

Because feeling and association depend on individual perceptions, their retention *alone* is never sufficient to support eligibility of a property for the National Register.

ASSESSING INTEGRITY IN PROPERTIES

Integrity is based on significance: why, where, and when a property is important. Only after significance is fully established can you proceed to the issue of integrity.

The steps in assessing integrity are:

- Define the **essential physical features** that must be present for a property to represent its significance.
- Determine whether the **essential physical features are visible** enough to convey their significance.
- Determine whether the property needs to be **compared with similar properties.** And,
- Determine, based on the significance and essential physical features, **which aspects of integrity** are particularly vital to the property being nominated and if they are present.

Ultimately, the question of integrity is answered by whether or not the property retains the **identity** for which it is significant.

DEFINING THE ESSENTIAL PHYSICAL FEATURES

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both *why* a property is significant (Applicable Criteria and Areas of Significance) and *when* it was significant (Periods of Significance). They are the features without which a property can no longer be identified as, for instance, a late 19th century dairy barn or an early 20th century commercial district.

CRITERIA A AND B

A property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s). If the property is a site (such as a treaty site) where there are no material cultural remains, the setting must be intact.

Archeological sites eligible under Criteria A and B must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to convey important associations with events or persons.

CRITERION C

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible *if* it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

Archeological sites eligible under Criterion C must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to illustrate a site type, time period, method of construction, or work of a master.

CRITERION D

For properties eligible under Criterion D, including archeological sites and standing structures studied for their information potential, less attention is given to their overall condition, than it they were being considered under Criteria A, B, or C. Archeological sites, in particular, do not exist today exactly as they were formed. There are always cultural and natural processes that alter the deposited materials and their spatial relationships.

For properties eligible under Criterion D, integrity is based upon the property's potential to yield specific data that addresses important research questions, such as those identified in the historic context documentation in the Statewide Comprehensive Preservation Plan or in the research design for projects meeting the *Secretary of the Interior's Standards for Archeological Documentation.*

INTERIORS

Some historic buildings are virtually defined by their exteriors, and their contribution to the built environment can be appreciated even if their interiors are not accessible. Examples of this would include early examples of steel-framed skyscraper construction. The great advance in American technology and engineering made by these buildings can be read from the outside. The change in American popular taste during the 19th century, from the symmetry and simplicity of architectural styles based on classical precedents, to the expressions of High Victorian styles, with their combination of textures, colors, and asymmetrical forms, is readily apparent from the exteriors of these buildings.

Other buildings "are" interiors. The Cleveland Arcade, that soaring 19th century glass-covered shopping area, can only be appreciated from the inside. Other buildings in this category would be the great covered train sheds of the 19th century.

In some cases the loss of an interior will disqualify properties from listing in the National Register—a historic concert hall noted for the beauty of its auditorium and its fine acoustic qualities would be the type of property that if it were to lose its interior, it would lose its value as a historic resource. In other cases, the overarching significance of a property's exterior can overcome the adverse effect of the loss of an interior.

In borderline cases particular attention is paid to the significance of the property and the remaining historic features.

HISTORIC DISTRICTS

For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance.

When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.

A component of a district cannot contribute to the significance if:

- it has been substantially altered since the period of the district's significance *or*
- it does not share the historic associations of the district.

VISIBILITY OF PHYSICAL FEATURES

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction. Archeological properties are often the exception to this; by nature they usually do not require visible features to convey their significance.

NON-HISTORIC EXTERIORS

If the historic *exterior* building material is covered by non-historic material (such as modern siding), the property can still be eligible *if* the significant form, features, and detailing are not obscured. If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.

PROPERTY CONTAINED WITHIN ANOTHER PROPERTY

Some properties contain an earlier structure that formed the nucleus for later construction. The exterior property, if not eligible in its own right, can qualify on the basis of the interior property *only if* the interior property can yield significant information about a specific construction technique or material, such as rammed earth or tabby. The interior property *cannot* be used as the basis for eligibility if it has been so altered that it no longer contains the features that could provide important information, or if the presence of important information cannot be demonstrated.

SUNKEN VESSELS

A sunken vessel can be eligible under Criterion C as embodying the distinctive characteristics of a method of construction if it is structurally intact. A *deteriorated* sunken vessel, no longer structurally intact, can be eligible under Criterion D if the remains of either the vessel or its contents is capable of yielding significant information. For further information, refer to *National Register Bulletin: Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places.*

Natural Features

A natural feature that is associated with a historic event or trend, such as a rock formation that served as a trail marker during westward expansion, must retain its historic appearance, unobscured by modern construction or landfill. Otherwise it is not eligible, even though it remains intact.

COMPARING SIMILAR PROPERTIES

For some properties, comparison with similar properties should be considered during the evaluation of integrity. Such comparison may be important in deciding what physical features are essential to properties of that type. In instances where it has not been determined what physical features a property must possess in order for it to reflect the significance of a historic context, comparison with similar properties should be undertaken during the evaluation of integrity. This situation arises when scholarly work has not been done on a particular property type or when surviving examples of a property type are extremely rare. (See **Comparing Related Properties** in *Part V: How to Evaluate a Property within its Historic Context.)*

RARE EXAMPLES OF A PROPERTY TYPE

Comparative information is particularly important to consider when evaluating the integrity of a property that is a rare surviving example of its type. The property must have the essential physical features that enable it to convey its historic character or information. The rarity and poor condition, however, of other extant examples of the type may justify accepting a greater degree of alteration or fewer features, provided that enough of the property survives for it to be a significant resource.

Eligible

- A one-room schoolhouse that has had all original exterior siding replaced and a replacement roof that does not exactly replicate the original roof profile can be eligible if the other extant rare examples have received an even greater degree of alteration, such as the subdivision of the original one-room plan.

Not Eligible

- A mill site contains information on how site patterning reflects historic functional requirements, but parts of the site have been destroyed. The site is not eligible for its information potential if a comparison of other mill sites reveals more intact properties with complete information.

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DETERMINING THE RELEVANT ASPECTS OF INTEGRITY

Each type of property depends on certain aspects of integrity, more than others, to express its historic significance. Determining which of the aspects is most important to a particular property requires an understanding of the property's significance and its essential physical features.

CRITERIA A AND B

A property important for association with an event, historical pattern, or person(s) ideally might retain *some* features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance, and would not be relevant if the property were a site. A basic integrity test for a property associated with an important event or person is whether a historical contemporary would recognize the property as it exists today.

For archeological sites that are eligible under Criteria A and B, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the potential to yield information is required.

Eligible

A mid-19th century waterpowered mill important for its association with an area's industrial development is eligible if:

- it is still on its original site (**Location**), and
- the important features of its setting are intact (**Setting**), and
- it retains most of its historic materials (**Materials**), and
- it has the basic features expressive of its design and function, such as configuration, proportions, and window pattern (**Design**).

Not Eligible

A mid-19th century waterpowered mill important for its association with an area's industrial development is not eligible if:

- it has been moved (**Location, Setting, Feeling**, and **Association**), or
- substantial amounts of new materials have been incorporated (**Materials, Workmanship,** and **Feeling**), or
- it no longer retains basic design features that convey its historic appearance or function (**Design, Workmanship,** and **Feeling**).

CRITERION C

A property significant under Criterion C must retain those physical features that characterize the type, period, or method of construction that the property represents. Retention of design, workmanship, and materials will usually be more important than location, setting, feeling, and association. Location and setting will be important, however, for those properties whose design is a reflection of their immediate environment (such as designed landscapes and bridges).

For archeological sites that are eligible under Criterion C, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the *potential* to yield information is required.

Eligible

A 19th century wooden covered bridge, important for illustrating a construction type, is eligible if:

- the essential features of its design are intact, such as abutments, piers, roof configuration, and trusses (**Design, Workmanship,** and **Feeling**), and
- most of the historic materials are present (**Materials, Workmanship**, and **Feeling**), and
- evidence of the craft of wooden bridge technology remains, such as the form and assembly technique of the trusses (**Workmanship**).
- Since the design of a bridge relates directly to its function as a transportation crossing, it is also important that the bridge still be situated over a waterway (**Setting, Location, Feeling,** and **Association**).

Not Eligible

For a 19th century wooden covered bridge, important for its construction type, replacement of some materials of the flooring, siding, and roofing would not necessarily damage its integrity. Integrity would be lost, however, if:

- the abutments, piers, or trusses were substantially altered (**Design, Workmanship,** and **Feeling**) or
- considerable amounts of new materials were incorporated (**Materials, Workmanship,** and **Feeling**).
- Because environment is a strong factor in the design of this property type, the bridge would also be ineligible if it no longer stood in a place that conveyed its function as a crossing (**Setting, Location, Feeling,** and **Association**).

CRITERION D

For properties eligible under Criterion D, setting and feeling may not have direct bearing on the property's ability to yield important information. Evaluation of integrity probably will focus primarily on the location, design, materials, and perhaps workmanship.

Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns can be eligible if:

- floral or faunal remains are found in clear association with cultural material (**Materials** and **Association**) and
- the site exhibits stratigraphic separation of cultural components (**Location**).

Not Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns would not be eligible if:

- floral or faunal remains were so badly decomposed as to make identification impossible (**Materials**), or
- floral or faunal remains were disturbed in such a manner as to make their association with cultural remains ambiguous (**Association**), or
- the site has lost its stratigraphic context due to subsequent land alterations (**Location**).

Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period can be eligible if:

- the site contains lithic debitage, finished stone tools, hammerstones, or antler flakers (**Material** and **Design**), and
- the site contains datable material (**Association**).

Not Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period would not be eligible if:

- the site contains natural deposits of lithic materials that are impossible to distinguish from culturally modified lithic material (**Design**) or
- the site does not contain any temporal diagnostic evidence that could link the site to the Late Archaic period (**Association**).

IX. SUMMARY OF THE NATIONAL HISTORIC LANDMARKS CRITERIA FOR EVALUATION

A property being nominated to the National Register may also merit consideration for potential designation as a National Historic Landmark. Such consideration is dependent upon the stringent application of the following distinct set of criteria (found in the *Code of Federal Regulations, Title 36, Part 65*).

NATIONAL HISTORIC LANDMARKS CRITERIA

The quality of national significance is ascribed to districts, sites, buildings, structures, and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering, and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association, and:

1. That are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or
2. That are associated importantly with the lives of persons nationally significant in the history of the United States; or
3. That represent some great idea or ideal of the American people; or
4. That embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; or
5. That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or
6. That have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

NATIONAL HISTORIC LANDMARK EXCLUSIONS

Ordinarily, cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings and properties that have achieved significance within the past fifty years are not eligible for designation. If such properties fall within the following categories they may, nevertheless, be found to qualify:

1. A religious property deriving its primary national significance from architectural or artistic distinction or historical importance; or
2. A building or structure removed from its original location but which is nationally significant primarily for its architectural merit, or for association with persons or events of transcendent importance in the nation's history and the association consequential; or
3. A site of a building or structure no longer standing but the person or event associated with it is of transcendent importance in the nations's history and the association consequential; or

4. A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building, or structure directly associated with the productive life of that person exists; or
5. A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or an exceptionally significant event; or
6. A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived; or
7. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or
8. A property achieving national significance within the past 50 years if it is of extraordinary national importance.

COMPARING THE NATIONAL HISTORIC LANDMARKS CRITERIA AND THE NATIONAL REGISTER CRITERIA

In general, the instructions for preparing a National Register nomination and the guidelines stated in this bulletin for applying the National Register Criteria also apply to Landmark nominations and the use of the Landmark criteria. While there are specific distinctions discussed below, *Parts IV and V* of this bulletin apply equally to National Register listings and Landmark nominations. That is, the categories of historic properties are defined the same way; historic contexts are identified similarly; and comparative evaluation is carried out on the same principles enumerated in *Part V*.

There are some differences between National Register and National Historic Landmarks Criteria. The following is an explanation of how each Landmark Criterion compares with its National Register Criteria counterpart:

CRITERION 1

This Criterion relates to National Register Criterion A. Both cover properties associated with events. The Landmark Criterion, however, requires that the events associated with the property be *outstandingly* represented by that property and that the property be related to the broad national patterns of U.S. history. Thus, the quality of the property to convey and interpret its meaning must be of a higher order and must relate to national themes rather than the narrower context of State or local themes.

CRITERION 2

This Criterion relates to National Register Criterion B. Both cover properties associated with significant people. The Landmark Criterion differs in that it specifies that the association of a person to the property in question be an important one and that the person associated with the property be of *national* significance.

CRITERION 3

This Criterion has no counterpart among the National Register Criteria. It is rarely, if ever, used alone. While not a landmark at present, the Liberty Bell is an object that might be considered under this Criterion. The application of this Criterion obviously requires the most careful scrutiny and would apply only in rare instances involving ideas and ideals of the highest order.

CRITERION 4

This Criterion relates to National Register Criterion C. Its intent is to qualify exceptionally important works of architecture or collective elements of architecture extraordinarily significant as an ensemble, such as a historic district. Note that the language is more restrictive than that of the National Register Criterion in requiring that a candidate in architecture be "a specimen exceptionally valuable for the study of a period, style, or method of construction" rather than simply embodying distinctive characteristics of a type, period, or method of construction. With regard to historic districts, the Landmarks Criterion requires an entity that is distinctive and exceptional. Unlike National Register Criterion C, this Criterion will not qualify the works of a master, per se, but only such works which are exceptional or extraordinary. Artistic value is considered only in the context of history's judgement in order to avoid current conflicts of taste.

CRITERION 5

This Criterion does not have a strict counterpart among the National Register Criteria. It may seem redundant of the latter part of Landmark Criterion 4. It is meant to cover collective entities such as Greenfield Village and historic districts like New Bedford, Massachusetts, which qualify for their collective association with a nationally significant event, movement, or broad pattern of national development.

CRITERION 6

The National Register counterpart of this is Criterion D. Criterion 6 was developed specifically to recognize archeological sites. All such sites must address this Criterion. The following are the qualifications that distinguish this Criterion from its National Register counterpart: the information yielded or likely to be yielded must be of *major* scientific importance by revealing new cultures, or by shedding light upon periods of occupation *over large areas* of the United States. Such sites should be expected to yield data affecting *theories, concepts, and ideas* to a *major degree.*

The data recovered or expected to be recovered must make a major contribution to the existing corpus of information. Potentially recoverable data must be likely to revolutionize or substantially modify a major theme in history or prehistory, resolve a substantial historical or anthropological debate, or close a serious gap in a major theme of U. S. history or prehistory.

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EXCLUSIONS AND EXCEPTIONS TO THE EXCLUSIONS

This section of the National Historic Landmarks Criteria has its counterpart in the National Register's "Criteria Considerations." The most abundant difference between them is the addition of the qualifiers "national," "exceptional," or "extraordinary" before the word significance. Other than this, the following are the most notable distinctions:

EXCLUSION 2

Buildings moved from their original location, qualify only if one of two conditions are met: 1) the building is nationally significant for architecture, *or* 2) the persons or events with which they are associated are of *transcendent* national significance and the association is consequential.

Transcendent significance means an order of importance higher than that which would ordinarily qualify a person or event to be nationally significant. A consequential association is a relationship to a building that had an evident impact on events, rather than a connection that was incidental and passing.

EXCLUSION 3

This pertains to the site of a structure no longer standing. There is no counterpart to this exclusion in the National Register Criteria. In order for such a property to qualify for Landmark designation it must meet the second condition cited for Exclusion 2.

EXCLUSION 4

This exclusion relates to Criteria Consideration C of the National Register Criteria. The only difference is that a burial place qualifies for Landmark designation only if, in addition to other factors, the person buried is of *transcendent* national importance.

When evaluating properties at the national level for designation as a National Historic Landmark, please refer to the National Historic Landmarks outline, *History and Prehistory in the National Park System and the National Historic Landmarks Program, 1987*. (For more information about the National Historic Landmarks program, please write to Department of the Interior, National Park Service, National Historic Landmarks, 1849 C Street, NW, NC400, Washington, DC 20240.)

X. GLOSSARY

Associative Qualities - An aspect of a property's history that links it with historic events, activities, or persons.

Code of Federal Regulations - Commonly referred to as "CFR." The part containing the National Register Criteria is usually referred to as 36 CFR 60, and is available from the National Park Service.

CLG - Certified Local Government.

Culture - A group of people linked together by shared values, beliefs, and historical associations, together with the group's social institutions and physical objects necessary to the operation of the institution.

Cultural Resource - See Historic Resource.

Evaluation - Process by which the significance and integrity of a historic property are judged and eligibility for National Register listing is determined.

Historic Context - An organizing structure for interpreting history that groups information about historic properties that share a common theme, common geographical area, and a common time period. The development of historic contexts is a foundation for decisions about the planning, identification, evaluation, registration, and treatment of historic properties, based upon comparative historic significance.

Historic Integrity - The unimpaired ability of a property to convey its historical significance.

Historic Property - See Historic Resource.

Historic Resource - Building, site, district, object, or structure evaluated as historically significant.

Identification - Process through which information is gathered about historic properties.

Listing - The formal entry of a property in the National Register of Historic Places. See also, Registration.

Nomination - Official recommendation for listing a property in the National Register of Historic Places.

Property Type - A grouping of properties defined by common physical and associative attributes.

Registration - Process by which a historic property is documented and nominated or determined eligible for listing in the National Register.

Research Design - A statement of proposed identification, documentation, investigation, or other treatment of a historic property that identifies the project's goals, methods and techniques, expected results, and the relationship of the expected results to other proposed activities or treatments.

XI. LIST OF NATIONAL REGISTER BULLETINS

The Basics
How to Apply National Register Criteria for Evaluation *

Guidelines for Completing National Register of Historic Places Form
Part A: How to Complete the National Register Form *
Part B: How to Complete the National Register Multiple Property Documentation Form *

Researching a Historic Property *

Property Types
Guidelines for Evaluating and Documenting Historic **Aids to Navigation** *

Guidelines for Identifying, Evaluating and Registering **America's Historic Battlefields**

Guidelines for Evaluating and Registering Historical **Archeological Sites**

Guidelines for Evaluating and Documenting Historic **Aviation Properties**

Guidelines for Evaluating and Registering **Cemeteries and Burial Places**

How to Evaluate and Nominate **Designed Historic Landscapes** *

Guidelines for Identifying, Evaluating and Registering Historic **Mining Sites**

How to Apply National Register Criteria to **Post Offices** *

Guidelines for Evaluating and Documenting **Properties Associated with Significant Persons**

Guidelines for Evaluating and Documenting **Properties That Have Achieved Significance Within the Last Fifty Years** *

Guidelines for Evaluating and Documenting **Rural Historic Landscapes** *

Guidelines for Evaluating and Documenting **Traditional Cultural Properties** *

Nominating Historic **Vessels and Shipwrecks** to the National Register of Historic Places

Technical Assistance
Defining Boundaries for National Register Properties*

Guidelines for Local Surveys: A Basis for Preservation Planning *

How to Improve the Quality of Photographs for National Register Nominations

National Register Casebook: Examples of Documentation *

Using the UTM Grid System to Record Historic Sites

To order these publications, write to: National Register of Historic Places, National Park Service, 1849 C St., NC 400, NW, Washington, D.C. 20240, or e-mail at: nr_reference@nps.gov. Publications marked with an asterisk (*) are also available in electronic form at **www.cr.nps.gov/nr**.

U.S. GOVERNMENT PRINTING OFFICE: 2005—717-788

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Letter A-9

City of Riverside
March 10, 2023

A-9.1 This comment is an email transmittal of the comment letter. Specific comments regarding the Draft EIR are provided and responded to below.

A-9.2 This comment is introductory in nature and refers to detailed comments below. Specific comments regarding the Draft EIR are provided and responded to below.

A-9.3 This comment requests that the City's Public Works, Traffic Engineering Division be given an opportunity to review the Construction Management Plan and requests a meeting to discuss the traffic signal warrant analysis and associated improvements. Additionally, the City requests that March JPA coordinate with the Riverside Transit Authority (RTA) for any proposed bus stop amenities for Barton Street. The comment further references comments on the Traffic Analysis attached to the comment letter. March JPA and the Project traffic engineer will work with the City's Public Works department to discuss the traffic signal warrant analysis prepared as part of the Traffic Study, the recommended intersection improvements, and share the Construction Traffic Management Plan once prepared as required by MM-TRA-1. The Project Traffic Analysis (Appendix N-2) identifies improvements for each analysis scenario and identifies when the improvements would be needed to address operational deficiencies. Table 1.4 of the Project Traffic Analysis (Appendix N-2) outlines the Project's fair share costs for operational deficiencies at off-site intersections. PDF-TRA-4 requires the Project to pay said fair share costs. It would be up to the individual jurisdictions to implement any improvements.

March JPA has been in communication and will continue to communicate with RTA for planned improvements, including the installation of bus stop amenities on Alessandro Boulevard near Barton Street. The timing of the financial contribution is to occur prior to grading permit. As outlined in Comment Letter A-3, RTA reviewed the Draft EIR and did not have any comments or concerns at this time. Specific comments regarding the Draft EIR, including the referenced Traffic Analysis comments, are provided and responded to below.

A-9.4 This comment addresses traffic matters associated with the operation of the Project. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3):

- Section 1.10: As noted, the Project Traffic Analysis (Appendix N-2) identified a number of potential traffic calming measures for Barton Street in Section 1.10. As explained in Section 4.15, Transportation, of the Draft EIR, "MM-TRA-2 would require the Project applicant to develop and implement a Barton Street Traffic Safety Plan with appropriate traffic calming measures such as raised crosswalks/sidewalk extensions, raised intersections, chicane, center line and curb adjustment, roundabouts and lane narrowing supplemented with speed activated speed limit signs/warning signs, additional signage, flashing beacons, approved by the March JPA Civil Engineer, in compliance with a three-party memorandum of understanding executed by the City of Riverside, March JPA, and Meridian Park LLC." MM-TRA-2 will be included in the MMRP which will be enforceable and monitored for compliance by March JPA.
- Section 1.6.1: Bike lanes are planned on Barton Street without on-street parking to maximize bike safety. Although no on-street parking will be provided along Barton Street, the Project will

be constructing off-street parking for the park and areas adjacent to the trail heads (see Figures 2-4 and 2-5 of the proposed West Campus Upper Plateau Specific Plan for conceptual designs). This will allow users to drive, park, and access the parks/trails. MM-TRA-2 requires the applicant to install "No Parking" signs to restrict on-street parking along Barton Street.

- Table 1-4: The commenting agency's request to include a condition for providing striping plans for improvements is noted for the record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
- Section 3.5:The commenting agency's request is to include a condition to work with the City of Riverside to finalize improvements and ensure that Project truck traffic adheres to adopted truck routes. March JPA appreciates the collaborative relationship between the City of Riverside, the County of Riverside and March JPA, in implementing the JPA's truck route ordinances. March JPA will continue to assure that these member agencies will participate in the preparation and adoption of the truck route ordinance. A condition of approval will be incorporated seeking input from the City of Riverside and County of Riverside in drafting an updated truck route ordinance to address changes to the existing truck routes to expand to the new development.

A-9.5 This comment questions whether rooftop and ground-mounted photovoltaics systems would constitute energy generation and distribution, which is prohibited throughout all areas of the Specific Plan. Additionally, the City requests that uses permitted within the Specific Plan area be allowed to include renewable, clean energy production. The prohibition against energy generation and distribution does not apply to rooftop solar used for the purpose of generating on-site power, as an ancillary use, for allowed and conditionally allowed uses, as identified in the Specific Plan's definition of Energy Generation and Distribution Facilities. Clean energy production as a "primary use" is not included at this time due to safety concerns with aircraft flying at March Air Reserve Base.

A-9.6 This comment requests that the Transportation section of the Draft EIR be updated if industrial uses are eliminated as permitted uses in the Mixed-Use Zone as recommended by the commenting agency and that the proposed Specific Plan consider allowing vehicular access from Barton Street for neighborhood and visitor-serving retail uses only. The restriction of mixed-use access directly onto Barton Street was at the request of local residents in order to limit the potential cut-through traffic into the existing residential neighborhoods to the south on Barton Street. As such, the Project Traffic Analysis (Appendix N-2) reallocated all passenger car traffic (including mixed use traffic) onto Cactus Avenue to the east of Barton Avenue, with no direct connection of Cactus Avenue to Barton Street. If the mixed-use areas consider direct access onto Barton Street as part of future submittals, then changes to the access assumptions and potential operational effects of those changes would be assessed in a future supplemental traffic analysis.

A-9.7 This comment requests that outdoor construction activities comply with the City's Noise Code hours of operation (Riverside Municipal Code – RMC – Title 7). PDF-NOI-2 is consistent with the City of Riverside provisions for areas within 500 feet of a residential property line, which prohibits construction activity from 7:00 PM to 7:00 AM, Monday through Friday, prohibits from 5:00 PM to 8:00 AM on Saturdays, and

prohibited anytime on Sundays. Outside the 500-foot buffer distance, construction activities are prohibited between 10:00 PM and 6:00 AM, which is more restrictive than March JPA's Noise Ordinance.

A-9.8 This comment questions the location of the multipurpose trail along portions of Barton Street and suggests that it should be accommodated along the entire length of the Barton Street extension in order to ensure connectivity and usability. Section 4.5.3.b of the Project Specific Plan states: "A 10-foot-wide multipurpose trail is provided along the western side of Barton Street allowing for passive recreational opportunities and connecting neighboring residential areas to the park site and open space area." In response to this comment, PDF-TRA-1 has been revised, within the Final EIR, to conform with the Project Specific Plan.

A-9.9 This comment questions why truck route enforcement would be funded for two years pursuant to PDF-TRA-3 but construction is anticipated to occur over at least 4.35 years. The two-year enforcement and funding agreement, which would begin upon the issuance of the first Certificate of Occupancy, is to allow for more detailed enforcement of truck routes during the initial phases of the Project as truck drivers become accustomed to the posted truck routes. As the Project builds out, trucks will increasingly be accustomed to the posted truck routes, and the need for enforcement will reduce over time. In addition, as the Project builds out, the additional property taxes generated by the uses within the Project would assist with the on-going operational costs related to enforcement. PDF-TRA-3, within the Final EIR, has been revised to clarify timing.

A-9.10 This comment questions the installation of a natural gas backbone when the Project will not use natural gas. As a public utility, SoCal Gas has the right to install infrastructure in public rights-of-way. If SoCal Gas elects to install natural gas, the natural gas backbone would be installed by SoCal Gas in the public roadways. SoCal Gas does not have rights to privately held parcels, and Project development will not connect to it (PDF-AQ-1). Use of natural gas by building occupants was not assumed or evaluated within the Draft EIR.

A-9.11 This comment states that Figure 4-1, Cumulative Development Location Map, did not appear within the Draft EIR. Figure 4-1 was inadvertently omitted and has been included in the Final EIR. Table 4-2 did list all cumulative developments, and the locations of these developments. The addition of this figure into the EIR does not constitute new information that warrants recirculation of the Draft EIR.

A-9.12 Consistent with the commenting agency's suggestion, the analysis was updated to include the proposed Park as a sensitive receptor during operation of the proposed Project within the Recirculated Section 4.2, Air Quality. As explained therein, as well as in the Revised Health Risk Assessment (Appendix C-2), the results of the analysis indicate that a less than significant impact would occur for users (including children) of the Park as a result of Project operational emissions. The risk to Park users would be 1.18 in one million without mitigation and 0.62 with mitigation, both of which are less than the applicable SCAQMD threshold of 10 in one million. Additionally, at this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

A-9.13 This comment questions the cultural resources analysis as it relates to existing conditions of the Project site and the Weapons Storage Area (WSA). As explained in the BFSA Response to Comments (Appendix E-3):

- This comment raises concerns that the WSA historic evaluation incorrectly analyzed historic integrity before determining eligibility. In response to this comment, the WSA report has been revised to separate the eligibility analysis from the integrity analysis. (Appendix E-2.) The WSA and its individual buildings were determined not eligible under National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or the March JPA CEQA Guidelines criteria for historic resources.
- This comment alleges the WSA was not evaluated at the Riverside County level. March JPA is the lead agency for this Project, and the buildings were evaluated under NRHP, CRHR, and March JPA criteria. Using these criteria, the WSA buildings were evaluated on the national, state, and local levels and determined not historically significant or eligible for listing.

For informational purposes, the 2008 Riverside County Historical Landmarks Criteria states:

A historical resource must be significant under one or more of the following criteria in order to qualify for listing as a Riverside County Historical Landmark:

- Is associated with events that have made a significant contribution to the broad patterns of Riverside County's history and cultural heritage.
- Is associated with the lives of persons important to the history of Riverside County or its communities.
- Embodies the distinctive characteristics of a type, period, Riverside County region, or method of construction, or represents the work of an important creative individual or possesses high artistic values.
- Has yielded or may be likely to yield, information important in Riverside County, state of California, or national prehistory or history.

The analysis in the revised technical study (Appendix E-2), evaluated this potential resource individually and collectively, on a local level using the March JPA criteria. The March JPA criteria is substantially similar to the County's criteria so the analysis would be applicable in evaluating the WSA under County of Riverside criteria. Similarly, under County of Riverside criteria, the WSA buildings, individually and collectively, would not be historically significant or eligible for listing as a Riverside County Historical Landmark(s).

- This comment raises concerns regarding the Draft EIR's statement that the WSA igloo structures are the only one of their kind in California. The description of the WSA within the Draft EIR, as well as within the WSA report included as Appendix E-2 of the Draft EIR, erroneously stated the WSA igloos were the only United States Air Force-associated munitions storage igloos in California. Travis Air Force Base includes munitions storage igloos as part of the Travis AFB ADC Readiness National Register Historic District Area. Munitions bunkers are also found at Beale Air Force Base in Marysville and Edwards Air Force Base in Edwards. Further, the WSA igloos are not unique or distinctive examples of munitions storage igloos in California or the local region and are among the most common military-related weapons storage constructions. For example, similar igloos are regionally found at Fallbrook Ammunition Depot, Naval Weapons Station Seal Beach, and Marine Corps Air Station El Toro. Additionally,

Concord Naval Weapons Station in San Francisco includes a larger weapons storage area that features various underground and overground bunkers constructed in different periods and styles. Sierra Army Depot in Herlong includes over 800 munitions storage igloos and igloos remain from the closed Benicia Arsenal in Benicia. The text within Section 4.4, Cultural Resources, of the Final EIR as well as the WSA report have been revised to accurately describe the state and regional context for the WSA igloos. The WSA and its individual buildings were determined not eligible under NRHP, CRHR, or the March JPA CEQA Guidelines criteria for historic resources at the national, state, or local level.

- This comment raises concerns regarding the Draft EIR's analysis of integrity of association and integrity of feeling. The WSA and its individual buildings were determined not eligible under NRHP, CRHR, or the March JPA CEQA Guidelines criteria for historic resources. Integrity of association was assessed by evaluating if the resources represent the place where the historic event or activity occurred and are sufficiently intact to convey that relationship to an observer. As discussed under CRHR and March JPA Criteria 1 and 2/NRHP Criteria A and B, the WSA buildings, individually and collectively, are not associated with an important historic event or person and, therefore, have never possessed integrity of association. Integrity of feeling was assessed by evaluating whether or not the resources' features, in combination with their setting, conveyed a historic sense of the property during the period of significance. Although the WSA's period of significance was the Cold War, Igloos A1 to A14 were constructed in the same style as World War II igloos and Buildings B to G were constructed in the Utilitarian style with no distinctive features related to their use. The WSA buildings' features do not express a historic sense of the Cold War. Therefore, the WSA buildings, individually or collectively, have never possessed integrity of feeling. The integrity of association and feelings analyses have been updated within Section 4.4, Cultural Resources, of the Final EIR as well as the WSA report (Appendix E-2).

A-9.14 This comment suggests that local register eligibility should be included within the impact analysis of Section 4.4, Cultural Resources, of the Draft EIR. As March JPA is the lead agency for this project, the WSA buildings were evaluated under NRHP, CRHR, and the March JPA criteria. See Response A-9.13, above, for a discussion of the WSA under the County of Riverside criteria for informational purposes.

A-9.15 This comment states that the cumulative impacts analysis for cultural resources may need to be adjusted in light of the comments provided about the WSA above. As discussed in Responses A-9.13 and A-9.14 above, the analysis for the WSA has been updated, and no changes to the cumulative impact analysis are required.

A-9.16 The comment requests details as to the quantity of solar PV that would be installed by the Project. In response to comments, MM-GHG-1 has been revised to require installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.

A-9.17 This comment questions the Draft EIR's analysis in Table 4.7-3, 2017 Scoping Plan Consistency Summary, as it relates to VMT reduction. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-3) and the Project VMT Analysis (Appendix N-1), the Project's retail component will reduce regional VMT and the Project's non-retail component VMT per employee is 5.3% below the WRCOG threshold. Further, MM-AQ-21 requires tenants who employ 250 or more employees on a full-

or part-time basis to comply with South Coast Air Quality Management District (SCAQMD) Rule 2202, On-Road Motor Vehicle Mitigation Options. MM-AQ-21 further requires tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) to either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to March JPA. In response to this comment, Table 4.7-3, 2017 Scoping Plan Consistency Summary, of the EIR has been revised accordingly. This revision does not modify any of the analysis or change any conclusions in the Draft EIR and does not add any new significant impacts.

A-9.18 The comment states that the Project may not be consistent with Goal 5 of the Connect SoCal RTP/SCS to "Reduce greenhouse gas emissions and improve air quality" measure as set forth in Table 4.7-5 of the Draft EIR. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-3), to meet that goal, "Connect SoCal includes a sustainable communities strategy which sets forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportations measures and policies, if implemented, will reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by ARB for the SCAG region." The forecasted development pattern is based on a regional growth forecast that was developed by working with local jurisdictions using the most recent land use plans and policies and planning assumptions.[4]

SCAG explicitly found that "For the purpose of determining consistency with Connect SoCal for California Environmental Quality Act (CEQA), grants or other opportunities, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency."[5] March JPA determines consistency with Connect SoCal based on consistency with the long-term employment and growth projections.

The proposed Project would increase regional employment by approximately 3,622 jobs in total. According to SCAG's 2020-2045 RTP/SCS, employment within Riverside County in 2019 is approximately 812,800 jobs with an anticipated increase to approximately 1,102,700 jobs by 2045, a growth of approximately 289,900 jobs. The proposed Project contributes 1.24% of the anticipated increase in jobs, and therefore, it is consistent with the job growth and would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or the AQMP or result in employment growth that would substantially add to traffic congestion. Additionally, the Project would comply with the policies set forth in the 2020-2045 RTP/SCS by reducing vehicle trips and VMT, increasing the use of alternative fuel vehicles, and improving energy efficiency. (Appendix C-4 of the Final EIR)

The proposed Project is consistent with the long-term employment and growth projections used by SCAG in the RTP/SCS and is therefore consistent with Connect SoCal. Moreover, the Project does not impede implementation of improvements to the transportation network, and other transportation measures and policies. Therefore, the Project would be consistent with the SCAG's goal to "reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by ARB for the SCAG region." (Appendix C-4 of the Final EIR)

The commenting agency is correct that the EIR identifies significant and unavoidable impacts related to criteria air pollutant emissions associated with Project operation. However, this is not a factor in

[4] https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020
[5] Connect SoCal p. xiv

determining consistency with the RTP/SCS. In fact, the EIR and subsequent addenda that were prepared for Connect SoCal all found that implementation of the plan would result in significant and unavoidable air quality impacts.

> "While the SCAG region may see an increase in $PM_{2.5}$, PM_{10} and SOx emissions, the SCAQMD, AVAPCD, ICAPCD, and MDAQMD have not established regional thresholds to determine significance. The air districts within the SCAG region have only established project-level thresholds (see Table 3.3-9, Table 3.3-10, and Table 3.3-11). Therefore, individual projects must compare anticipated project emissions to the thresholds for the air district within which they are located in order to determine significance on the project-level. Because mobile source emissions of PM_{10} and $PM_{2.5}$ will increase (PM_{10} would increase in Imperial, Orange, Riverside, and San Bernardino Counties and $PM_{2.5}$ would increase in Imperial, Riverside, and San Bernardino Counties), largely as a result of increased total VMT, and SOx would increase in the region at least through 2031, the Plan could contribute to an air quality violation. Further, there is the potential for individual projects to exceed local standards during construction and/or operation for several pollutants. Therefore, this impact is considered to be significant."[6]

While the Project will implement all of the applicable Connect SoCal mitigation measures and several other mitigation measures to reduce impacts to air quality as outlined in Recirculated Section 4.2, Air Quality, it would not be feasible to reduce emissions to less than significant levels. Further reduction of emissions must come from cars and trucks emissions, which are regulated by the EPA (Federal), CARB (State) and South Coast Air Quality Management District (Regional) and are outside March JPA's local jurisdiction and control. (Appendix C-4 of the Final EIR)

Additionally, the modeling conservatively does not account for emission reductions achieved by the use of zero emission vehicles, and as electric vehicles and electric trucks comprise larger portions of the vehicle fleet, emissions of the Project would be overrepresented. Similarly, while construction and operation of the proposed Project would generate GHG emissions, the Project will not interfere with or obstruct any GHG reduction plans and the Draft EIR identifies a comprehensive array of project design features and mitigation measures, which will reduce GHG emissions and improve air quality. For clarity, the identified language in Table 4.7-5, Project Consistency with the SCAG Connect SoCal RTP/SCS, of the EIR has been revised to reference these measures in addressing the Project's consistency with ConnectSoCal Goal 5. This revision does not modify any of the analysis or change any conclusions in the Draft EIR and does not add any new significant impacts.

A-9.19 This comment states that given the Project site's distance from existing public transit stops, the Project may be inconsistent with Goal 8 of the Transportation Element of the General Plan. This goal promotes "adequate, affordable, equitably distributed and energy efficient public and mass transit services which promote mobility to, from, and within the planning area." The commenting agency cites MM-GHG-11, which would fund improvements to proximate transit facilities. As discussed in Table 4.10-1 of Recirculated Section 4.10, Land Use and Planning, the Project site would be served by both local transit service and inter-city passenger rail service. The local transit system of bus stops and bus shelters would be approved by the Riverside Transit Agency. The closest bus stop is located on Alessandro Boulevard to the north of the Project site. The Metrolink passenger rail transit facility is located approximately 1.5 miles from the Campus Development. The 6-foot bike lanes on all Project roadways

[6] ConnectSoCal PEIR, pg. 3.3-61

and 6-foot sidewalks within the Project would enhance connectivity to the existing Metrolink Station. In addition to MM-GHG-11, the Project would be required to implement MM-AQ-21, which requires tenants who employ 250 or more employees on a full- or part-time basis shall comply with South Coast Air Quality Management District (SCAQMD) Rule 2202, On-Road Motor Vehicle Mitigation Options. MM-AQ-21 further requires tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to March JPA.

As such, with implementation of MM-GHG-11, as well as MM-AQ-21, the Project would include enhanced pedestrian connectivity to nearby transit facilities, last-mile solutions for equitable access to transit facilities, measures to promote transit use for employees and visitors to the Project, and additional measures consistent with the intent of Goal 8 within the Transportation Element of the March JPA General Plan.

A-9.20 This comment states that housing should not be considered an incompatible use with airfield uses because residential development under 6.0 dwelling units per acre is allowed within Compatibility Zone C2 and 3.0 dwelling units per acre is allowed within Compatibility Zone C1 of the March ARB/MIP Land Use Compatibility Plan. The March JPA General Plan identifies four general land use classifications with a total of 13 distinct land use designations. These include the following:

1. Industry: Business Park (BP), Industrial (I)
2. Commerce: Office (O), Mixed Use (MU) (complementary land uses including commercial, business park, office, medical, medical, educational and vocational, research and development, and services), Commercial (C), and Destination Recreation (DR)
3. Special: Military Operations/Aviation (MARB), Aviation (AV), Historic District (HD), Air Force Village West Expansion (AFVW), Cemetery Expansion (CE)
4. Public: Park/Recreation/Open Space (P/R/OS), Public Facility (PF)
5. Additionally, the March JPA General Plan states, "Buildout also reflects the preservation of the 111 units within the Historic District…". The Historic District is the only area within March JPA where residential land currently exists, and within the General Plan, buildout of residential was not planned for or envisioned. Further, the Housing Element within the March JPA General Plan states, "The master base reuse plan for March does not create additional housing opportunities within the planning area due to incompatible land uses within the airfield, the need to focus on the reestablishment of the numerous jobs lost due to base realignment, and the housing rich environment of Western Riverside County."

Finally, though not listed within the General Plan, the site lies under the military primary departure path for March ARB. Development of residential uses within this area would place future residents within areas of occasional evening/night aircraft noise and sleep disruption, which would result in an increase in evening aircraft noise complaints. The noise complaints would be viewed as a negative factor in any future Base Realignment and Closure Commission (BRAC) analysis of the future of March ARB.

For the reasons discussed above, the statement that "housing is incompatible with airfield uses adjacent to the planning area" is accurate, correct, and comes directly from the March JPA General Plan.

A-9.21 This comment states that the Project consistency analysis with Goal 7 within the Resource Management Element of the General Plan may need to be revisited based on comments the City provided relative to cultural and historic resources. As discussed in Response A-9.13, the conclusions relative to cultural and historic resources are correct, and therefore, no revisions or modifications to the discussion about Project consistency analysis with Goal 7 within the Resource Management Element of the General Plan are required. The commenting agency is also referred to Responses A-9.13 above regarding the cultural resources analysis.

A-9.22 This comment indicates that the site configurations, including loading dock locations cannot reasonably be known at this level of analysis, and as such, potential noise impacts on surrounding sensitive receptors cannot be reliably estimated or evaluated. However, a review of the operational noise source locations presented on Exhibit 9-A of the Noise Study, included within Appendix M-1 of the Draft EIR, includes over 300 individual noise sources to conservatively describe the potential worst-case noise environment. This includes a combination of noise sources such as loading dock activity, roof-top air conditioning, trash enclosure activity, parking lot vehicle movements, truck movements, and park activities.

To reduce the noise exposure to the noise sensitive residential areas near the Project site, several design features were considered throughout the site planning process and included in the proposed Specific Plan. These design features include positioning the loading dock areas in the center of the site and maintaining open space and the Conservation Easement to maximize the distance between noise source activities and the adjacent noise sensitive residential areas. In addition, the operational noise analysis included a planned 14-foot-high noise barrier/screen wall surrounding the loading dock areas.

The comment suggests that the noise analysis did not consider the potential warehousing within the mixed-use areas, which should reasonably be expected to include potential loading dock areas. The Project Noise Study operational analysis (see Exhibit 9-A of Appendix M-1) shows that the Business Park and Mixed-Use land use areas include loading activity as a potential noise source. However, as noted by the comment, Figure 4.11-9 is not accurate. In the Final EIR, Figure 4.11-9 has been revised to reflect Exhibit 9-A of the Project Noise Study (Appendix M-1). This revision does not modify any of the analysis or change any conclusions in the Draft EIR and does not add any new significant impacts.

A-9.23 This comment notes that the County of Riverside does not have an HCD-certified Housing Element as of March 2023. Section 4.12, Population and Housing, has been updated to reflect this comment. This addition and a lack of an HCD-certified Housing Element within the County of Riverside does not affect the analysis or conclusions within the Draft EIR for the proposed Project.

A-9.24 The comment questions the potential need for additional housing resulting from the increase in jobs associated within the proposed Project. In response, please see Topical Response 5 – Jobs.

A-9.25 This comment requests that the Transportation section of the Draft EIR be updated in the event that the proposed Specific Plan allows vehicular access from Barton Street for neighborhood and visitor-serving retail uses as suggested by the commenting agency. Please refer to Response A-9.6 above.

A-9.26 This comment states that the Draft EIR should clarify the category under which warehousing and logistics-related land uses were categorized for the purpose of determining appropriate significance thresholds for the Project's VMT impacts. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3) and the Project VMT Analysis (Appendix N-1), per OPR's

Technical Advisory, VMT per employee is the appropriate VMT metric for analysis for projects that are not residential or retail land use types. Therefore, the Project's industrial, business park, and non-retail mixed land uses are evaluated based on the metric of VMT per employee. As explained in Section 4.15, Transportation, of the Draft EIR and Appendix N-1, a significant impact to VMT would occur if the addition of the Project's industrial/business park/non-retail mixed use components would result in Project-generated VMT per employee to exceed 15% below the WRCOG's baseline of 29.97 VMT per employee for a regional average significance threshold of 25.47 VMT per employee. Table 4.15-3 of the Draft EIR and Table 1 of the VMT Analysis disclosed the number of employees per land use type, industrial (inclusive of warehousing), business park and retail that were input into RIVCOM. The 2,340 non-retail employees include industrial employees who would drive to and from the warehouse buildings. Therefore, the VMT per non-retail employee presented in the VMT Analysis applies to all of the warehouse uses analyzed in the Specific Plan Area. No components of the Project's land use buildout scenario were omitted. This same methodology was used in the Draft EIR and the VMT Analysis. It should be noted, the City of Moreno Valley traffic engineer concurred with the results of the VMT Analysis in a comment letter provided by the City on March 18, 2022 (see Comment A-4.33 and Response A-4.33, above).

A-9.27 This comment states that the conclusion that the Project would not include any improvements that would interfere with the construction of pedestrian or bicycle facilities in the future should be revisited because it does not address potential future bus or other mass transit service that may be established by future uses within the Specific Plan area. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project site is currently served by the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. Existing transit routes in the vicinity of the study area are illustrated in Figure 4.15-5 of the Draft EIR. As shown, the existing RTA Route 20 provides service from Alessandro Boulevard to the Moreno Valley March Field Metrolink Station. RTA Route 27 also runs along Orange Terrace Parkway and Van Buren Boulevard to the south of the Project. There is an existing bus stop on Alessandro Boulevard near Brown Street. RTA submitted a comment letter on the Project (Comment Letter A-3, above) indicating it does not have comments at this time and noting the inclusion of sidewalks along the Project's main roads, which will provide safe pathways for pedestrians to connect to public transportation. The channelization and/or signage preventing trucks traveling east on Cactus Avenue from turning left onto Brown Street would not interfere with future bus or other mass transit service. Buses or other mass transit service would be able to access the Campus Development via Brown Street and return to existing routes along Alessandro Boulevard via Cactus Avenue and Meridian Parkway.

A-9.28 This comment states that the Project involves land use changes that have not been adopted by March JPA, and thus are not reflected in the March JPA General Plan and were therefore not a part of the baseline conditions used to prepare the 2020 RTP/SCS growth projections. The March JPA General Plan did envision buildout of the West Campus Upper Plateau area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. As such, buildout of this area was envisioned and is part of the baseline conditions used to prepare the 2020 RTP/SCS growth projections.

A-9.29 This comment requests inclusion of a non-industrial alternative. In response, please see Topical Response 8 – Alternatives, for the analysis of Alternative 5 – Non-Industrial Alternative.

A-9.30 This comment states that Figure 6-1 does not appear to depict Alternative 2 - Reduced Development Area, as described in the Draft EIR. This figure has been revised and incorporated into Chapter 6, Alternatives, in the Final EIR in response to this comment. This revision does not constitute new information requiring recirculation of the Draft EIR Chapter 6, Alternatives.

A-9.31 The comment requests detailed information on how the Project would comply with Rule 2305 and how future lease agreements will implement emission reducing strategies. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR) and the Draft EIR, any future tenants would be required to comply with all applicable SCAQMD rules, including Rule 2305. However, as the future tenants are not known at this time, it is unknown which routes would be taken with regards to compliance with Rule 2305. Any future tenants would be required to comply with the mitigation measures and design features identified in the Draft EIR, as well as all applicable SCAQMD rules.

The following project design features and mitigation measures outline how the Project will implement emission reducing strategies, including through future lease agreements:

- PDF-AQ-1 prohibits the use of natural gas by Specific Plan Area development.
- PDF-GHG-1 requires conduit to be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available.
- MM-AQ-6 requires all buildings achieve the 2023 LEED Silver certification standards or equivalent, at a minimum.
- MM-AQ-8 requires all TRU loading docks provide electrical hookups and all loading docks designed to be compatible with SmartWay trucks.
- MM-AQ-9 requires buildings larger than 400,000 total square feet to include a truck operator lounge equipped with clean and accessible amenities such as restrooms, vending machines, television, and air conditioning.
- MM-AQ-11 requires main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available.
- MM-AQ-14 requires tenants utilize electric or battery-operated equipment for landscape maintenance.
- MM-AQ-17 requires truck drivers to shut off engines when not in use and three-minute truck idling limits.
- MM-AQ-18 requires use of only electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided.
- MM-AQ-19 requires tenants to be provided with information on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
- MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business

operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments on the Recirculated EIR, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed.

- MM-AQ-21 requires tenants who employ 250 or more employees on a full- or part-time basis shall comply with South Coast Air Quality Management District (SCAQMD) Rule 2202, On-Road Motor Vehicle Mitigation Options. MM-AQ-21 further requires tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to March JPA.
- MM-AQ-22 requires tenants provide information to employees and truck drivers on: Building energy efficiency, solid waste reduction, recycling, and water conservation; Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting; Participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies; Health effects of diesel particulates, state regulations limiting truck idling time, and the benefits of minimized idling; The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity; Efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- MM-AQ-23 requires the facility operator shall periodically sweep the property, including parking lots and truck courts, to remove road dust, tire wear, brake dust, and other contaminants.
- MM-AQ-24 prohibits the use of diesel back-up generators.
- MM-AQ-25 requires the facility operator monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable.
- MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
- MM-GHG-7 requires each Project site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code.
- MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables.

Additionally, the comment requests that the Project include public signage with SCAQMD's (or other appropriate agency) phone number to report violations. MM-AQ-16 requires signage with contact information for the tenant representative, March JPA, County of Riverside, and SCAQMD for complaints about excessive noise, dust, fumes, odors, and perceived Code violations. MM-AQ-17 requires signage detailing the idling restrictions to include telephone numbers of the building facilities manager, SCAQMD and CARB to report violations.

A-9.32 Consistent with the commenting agency's suggestion, the health risk assessment has been updated to include the proposed Park as a sensitive receptor during operation of the proposed Project. Please see Response A-9.12 above, Recirculated Section 4.2, Air Quality, and Appendix C-2.

A-9.33 This comment is conclusory in nature and does not raise any specific comments or questions on the Draft EIR.

A-9.34 This comment recommends limiting Business Park warehousing to 100,000 square feet within 800 feet of a residential zone and recommends eliminating Business Enterprise uses from the Mixed Use zone. This recommendation regarding Business Park warehousing has been incorporated into Table 3-2, Development Standards, of the proposed Specific Plan. This revision does not modify any of the analysis or change any conclusions in the Draft EIR and does not add any new significant impacts. The Business Enterprise designation is intended to provide a transitional environment that allows for limited commercial and office uses in conjunction with small scale industrial warehouse activity. It is understood that this activity may differ from what the City of Riverside currently allows in a mixed-use environment. However, the allowance of Business Enterprise within the Specific Plan Mixed Use land use is appropriate for this location and the overall development of the site and surrounding uses.

A-9.35 This comment recommends adding an objective to the proposed Specific Plan that states: "Prioritize compatibility of new development with existing adjoining sensitive land uses, particularly residential neighborhoods, park and recreation areas, schools and places of worship through comprehensive and context-sensitive development and design standards." Consistent with the commenting agency's suggestion, an objective has been added to Section 1.2, Specific Plan Objectives, of the proposed Specific Plan that addresses consideration for compatibility of new development with existing adjoining sensitive land uses through comprehensive development and design standards. This revision does not modify any of the analysis or change any conclusions in the Draft EIR and does not add any new significant impacts.

A-9.36 This comment questions why specific development applications (plot plans) are included in the Specific Plan document. The list of discretionary actions is provided to represent land development and use entitlement actions after the Specific Plan is approved and in effect. Those listed are representative of entitlement actions necessary under the jurisdiction of March JPA.

A-9.37 This comment states that there is no discussion of land use compatibility with other adjoining sensitive uses in the land use chapter of the proposed Specific Plan. Consistent with the commenting agency's suggestion, the Specific Plan has been revised and now refers to Section 4.10, Land Use and Planning, of the West Campus Upper Plateau Project EIR to provide further discussion on land use compatibility with other adjoining sensitive uses. This revision does not modify any of the analysis or change any conclusions in the Draft EIR and does not add any new significant impacts.

A-9.38 This comment recommends limiting Business Park warehousing to 100,000 square feet within 800 feet of a residential zone and recommends eliminating Business Enterprise uses from the Mixed Use zone. See Response A-9.34 above.

A-9.39 This comment includes recommendations for Table 3-1 within the West Campus Upper Plateau Specific Plan.

1. This comment requests prohibiting Business Enterprise uses in the Mixed Use District. The Business Enterprise designation is intended to provide a transitional environment that allows for limited commercial and office uses in conjunction with small scale warehouse activity. It is understood that this activity may differ from what the City of Riverside currently allows in a mixed-use environment. However, the allowance of Business Enterprise within the Specific Plan Mixed Use land use is appropriate for this location and the overall development of the site and surrounding uses.
2. This comment requests the Specific Plan permit non-emitting, renewable energy generation and distribution facilities. The Specific Plan will not include non-emitting, renewable energy generation and distribution facilities as a primary use, as the Riverside County Airport Land Use Commission (RCALUC) has already determined Table 3-1, West Campus Upper Plateau Specific Plan Land Use Table, of the proposed Specific Plan is consistent with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Further changes to the permitted uses within the proposed Specific Plan would require additional review by RCALUC.
3. Consistent with the commenting agency's suggestion and as discussed above in Response A-9.34, Table 3-2, Development Standards, of the proposed Specific Plan has been updated to limit Business Enterprise buildings to a maximum of 100,000 square feet within 800 feet of a residential zone.

A-9.40 This comment includes recommendations for Table 3-2 within the West Campus Upper Plateau Specific Plan.

- This comment requests vehicular access be permitted from Barton Street if Business Enterprise is not a permitted use in the Mixed Use District. As discussed above in Response A-9.34, Business Enterprise uses are to remain as permitted uses in the Mixed-Use Zones in the proposed Specific Plan. Therefore, the requested change to vehicular access within Barton Street is not applicable.
- Consistent with the commenting agency's suggestion, Section 3.5.4, Off-Street Loading Facilities, of the proposed Specific Plan has been revised to require off-street loading and unloading facilities to be fully screened from view of any residential zone or property. This revision does not modify any of the analysis or change any conclusions in the Draft EIR and does not add any new significant impacts.

A-9.41 This comment recommends including an additional objective to the proposed Specific Plan that states: "To protect surrounding sensitive uses, including residential neighborhoods, parks, open space and recreation areas, schools and places of worship, from the potential negative visual and aesthetic impacts of future development within the Specific Plan Area." Section 4.1, Purpose and Intent, of the proposed Specific Plan has been revised as requested. This revision does not modify any of the analysis or change any conclusions in the Draft EIR and does not add any new significant impacts.

A-9.42 This comment offers recommendations for architectural design guidelines within the proposed Specific Plan.

- This comment objects to the use of the word 'periodic'. Section 4.3.1.b, Building Form, will remain as is to provide design flexibility for future development.

- Consistent with the commenting agency's suggestion, Section 4.3.2.d, Building Materials, Colors and Textures, has been updated to provide that building color schemes be light earth, neutral or grey tones.
- Consistent with the commenting agency's suggestion, Section 4.4.2.a, Truck Courts and Loading Docks, has been revised to be a "shall" statement instead of a "should" statement.
- Consistent with the commenting agency's suggestion, Section 4.4.2.b, Truck Courts and Loading Docks, has been revised to include the following statement: "or in any location having a direct line of sight from surrounding residential land uses."
- Consistent with the commenting agency's suggestion, Section 4.4.2.c, Truck Courts and Loading Docks, has been revised to provide a "shall" statement instead of "should" and is moved from Chapter 4, Design Guidelines, to Section 3.5, Development Standards.
- This comments requests revisions regarding parapet wall height to ensure roof-mounted equipment is fully screened from any vantage point. Section 4.4.4.a, Rooftop Equipment, of the proposed Specific Plan will remain as currently written. The current language ensures rooftop equipment will not be visible to the public regardless of parapet wall height.
- Consistent with the commenting agency's suggestion, Section 4.4.8.c, Conservation Easement Protection, of the proposed Specific Plan has been revised to replace "near" with "within 100' of".

A-9.43 This comment offers recommendations for Section 6.8.1, Grading Plan Development Standards, of the proposed Specific Plan.

1. This comment asks for criteria March JPA will use to evaluate deviations from maximum 2:1 slope. In association with the entitlement and ministerial permit process, March JPA will review grading plans for the subject project and determine if the slope design is acceptable. Any exceptions to the maximum 2:1 slope identified will require review and approval by March JPA using industry-standard criteria and input from technical professionals.
2. This comment requests a reduction of minimum slope height to be consistent with City of Riverside requirements. Minimum slope height requiring permanent landscaping and irrigation will remain as is as it is consistent with standards provided in the approved March Business Center Specific Plan (SP-1 A8).

A-9.44 This comment requests Section 7.4.2, Development Plan Review, of the Specific Plan utilize the public notice provisions of March JPA Development Code Section 9.02.200(C). Section 7.4.2 of the proposed Specific Plan sets forth the process for ministerial review by the Implementation Committee of development proposals that are consistent with the Specific Plan, Design Guidelines, and Final EIR, a process affirmed by Health First v. March Joint Powers Authority (2009) 174 Cal.App.4th 1135. Meetings of the Implementation Committee would be subject to Brown Act public notification requirements, including 72-hour agenda posting and notification to the interested parties list. March JPA Development Code Section 9.02.200(C) outlines the public notification process for discretionary entitlements. Under the proposed Specific Plan, discretionary entitlements, including Conditional Use Permits (Section 7.4.4) and Variances (Section 7.4.5), would be subject to the public notification provisions of March JPA Development Code Section 9.02.200(C). March JPA will follow the processes outlined in the Specific Plan.

A-9.45 The comment addresses the Transportation analysis of the Draft EIR.

1. This comment requests a meeting to discuss the traffic signal warrant analysis and associated improvements. Please refer to Response A-9.3 above.
2. This comment requests that the City's Public Works, Traffic Engineering Division be given an opportunity to review the Construction Management Plan. Please refer to Response A-9.3 above.
3. This comment requests information on timeline/phasing program of improvements. The Project construction as analyzed in the EIR is set forth in Table 3-3 of Recirculated Chapter 3, Project Description. The Project Traffic Analysis (Appendix N-2) identifies improvements for each analysis scenario and identifies when the improvements would be needed to address operational deficiencies. Table 1.4 of the Traffic Analysis outlines the Project's fair share costs for operational deficiencies at off-site intersections. PDF-TRA-4 requires the Project to pay said fair share costs. It would be up to the individual jurisdictions to implement any improvements.
4. This comment requests that March JPA coordinate with the Riverside Transit Authority (RTA) for any proposed bus stop amenities for Barton Street. Please refer to Response A-9.3 above.
5. This comment requests the Project be conditioned to construct the speed feedback signs, speed limit signs, advisory speed signs, curb ahead warning signs and associated striping along Barton Street Refer to Response A-9.4, above, regarding MM-TRA-2, Barton Street Traffic Safety Plan.
6. This comment is acknowledged on the request to include a condition to work with the City of Riverside to ensure that Project truck traffic adheres to adopted truck routes. As has been standard practice, the City of Riverside will be asked to collaborate in the future March JPA Truck Route Ordinance amendment, addressing changes that will be implemented for the West Campus Upper Plateau development. Please refer to Response A-9.9 above.
7. This comment requests adjacent parking for trail users, a parking lane next to the multipurpose trail segment and 'No Parking' signage along the remainder of Barton Street. Please see Response A-9.4 above.
8. This comment requests the Project be conditioned to provide striping plans. Please see Response A-9.4 above regarding striping plans.

A-9.46 This attachment to the comment letter is a copy of the National Register Bulletin "How to Apply the National Register Criteria for Evaluation." The attachment is referenced in specific comments on the Draft EIR provided and responded to above. Please refer to Responses A-9.13 and A-9.14 above.

From: Cervantes, Clarissa <CCervantes@riversideca.gov>
Sent: Friday, March 10, 2023 3:42 PM
To: Dan Fairbanks
Cc: Lujano, Miguel
Subject: Comment Letter
Attachments: Comment Letter_Office of Ward 2 .cleaned.pdf

Good Afternoon,

Please see attached my comment letter.

A-10.1

Thank you,

Councilmember Clarissa Cervantes

Stay in-the-know with all things Riverside! Connect with us at RiversideCA.gov/Connect.

March 10, 2023
Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As the Ward 2 City Councilmember for the City of Riverside, I am writing to submit comments on the draft Environmental Impact Report for the proposed West Campus Upper Plateau. As a representative from an adjacent jurisdiction to this project, I have serious concerns regarding the proposed project's significant and unavoidable impacts on air quality, its effect on local traffic, and the potential harm and quality of life impact this can bring to residents.

In accordance with the City's charter and Resolution No. 23618, Section III.B., I am explicitly stating that my individual opinions and positions do not represent the City Council of the City, and these comments are my own as the Ward 2 Council representative. A-10.2

The comments and questions will be brief and summarize the inquiries my office has received in meeting with residents who live in close proximity to the proposed "West Campus Upper Plateau" and those across the City of Riverside:

1. Air quality impacts and mitigation: How will the developer mitigate the increased truck traffic and truck trips that are proposed? A-10.3
2. Project alternatives: What alternative projects can be envisioned and developed here working with the city, county, and JPA as partners? A-10.4
    a. What alternatives can be explored vs. large warehouses?
    b. What land use and zoning do we need for alternative projects to be viable?
    c. Can the city of Riverside partner with the JPA to find a new project that won't bring trucking and warehouses to residents backyards?
3. Infrastructure:
    a. Traffic analysis and enforcement: How will the project and developer cover costs for traffic enforcement through the Riverside Police Department to ensure trucks aren't cutting through neighborhoods? A-10.5
    b. Will there be community benefit costs for wear and tear to local infrastructure and expansion of roads? And/or added streetlights? A-10.6
    c. While we want to believe that drivers will follow the municipal ordinances, residents and I have witnessed large trucks violate the local city ordinances repeatedly, cutting through on our arterial streets, A-10.7

adding safety concerns and significant wear and tear to our local infrastructure.

A-10.7 Cont.

Considering the significant and unavoidable air quality and quality of life impacts created by the proposed development, I respectfully ask the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. Please encourage the developer to consider non-industrial, alternative uses of the land for the betterment of residents living adjacent to the site.

A-10.8

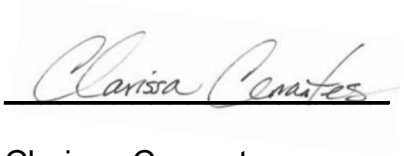
I encourage and request that the March Joint Powers Authority representatives explore working with the City and County of Riverside to explore clean air alternatives such as a solar farm, clean air technology, and workforce development that focuses on enhancing technical trades and training for residents in the City and adjacent communities, paired with suitable workforce housing.

A-10.9

I fully support the residents and constituents of Ward 2, and those living adjacent to the project in Ward 4, who have raised concerns and stand in opposition to this development proposal. I ask you consider the perspectives shared by our residents and join us as we collaboratively plan for the future of our neighborhoods and region. Should you have any further questions regarding my support of our Riverside residents in opposition of this project please contact my office at 951-826-4519 or via email at ccervantes@riversideca.gov.

A-10.10

Sincerely,



Clarissa Cervantes
Council Member, Ward 2
City of Riverside, CA

Letter A-10

City of Riverside Ward 2 Councilmember Cervantes
March 10, 2023

A-10.1 This comment is introductory in nature and does not raise any specific comments or questions about the Draft EIR.

A-10.2 This comment is introductory in nature and does not raise any specific comments or questions about the Draft EIR.

A-10.3 This comment requests information regarding mitigation for increased truck traffic and truck trips. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. See Recirculated Section 4.2, Air Quality, for a detailed evaluation of the revised and additional air quality mitigation measures.

A-10.4 This comment requests an alternative without warehousing. As explained in Topical Response 8 – Alternatives, in the Final EIR, in response to comments, Alternative 5 – Non-Industrial Alternative has been included in the EIR alternatives analysis. Please see the full description and analysis of Alternative 5, which includes analysis of emissions associated with construction and operations and vehicle trips. As discussed in greater detail in the alternatives analysis, Alternative 5 would result in more criteria air quality pollutant emissions and fewer diesel particulate matter emissions during operations when compared to the Project, and air quality impacts would still be considered significant and unavoidable under Alternative 5. With regard to vehicle trips, Alternative 5 would substantially reduce truck trips but nearly double vehicle trips as compared to the proposed Project. Under Alternative 5, the shifts in land use to non-industrial uses would result in a corresponding increase in overall vehicle trip generation and an associated increase in VMT over the proposed Project. As such, Alternative 5 would result in greater VMT impacts and introduce a new significant impact when compared to the proposed Project.

A-10.5 This comment questions costs of truck route enforcement to prevent trucks in residential neighborhoods. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Under PDF-TRA-1, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. No changes or revisions to the EIR are required in response to this comment.

A-10.6 This comment questions costs for wear and tear to local infrastructure, expansion of roads, and added streetlights. As Section 4.15, Transportation, explains, Table 1-4 of the Project Traffic Analysis (Appendix N-2 of the EIR) determined a fair share calculation for the Project for any improvement measures for identified operational deficiencies. PDF-TRA-4 requires the Project to contribute $321,799 as its fair share toward those improvement measures, including $152,467 to the City of Riverside. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. On a longer-term basis, roadway improvements are funded through gasoline tax. Gasoline tax is collected by State, who then distributes money back to counties based on the number of registered vehicles within that county. Money from the state becomes the "Road Fund" and must be used for road and transportation purposes. Commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[7]

A-10.7 This comment raises concerns regarding compliance with truck routes and wear and tear to local infrastructure See Responses A-10.5 and A-10.6, above.

A-10.8 This comment acknowledges that the Project would result in significant and unavoidable air quality impacts and asks that March JPA reject the Project and consider a non-industrial alternative. Please see Response A-10.4, above, regarding analysis of Alternative 5 – Non-Industrial Alternative. This comment does not raise any specific comments or questions about the analysis within the Draft EIR.

A-10.9 This comment requests consideration of clean air alternatives and alternatives for workforce development paired with suitable workforce housing. Clean energy production as a "primary use" is not included at this time due to concerns with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan and safety compatibility with overflights by aircraft utilizing the March Inland Port Airport. Under the proposed Project, university uses and research centers are allowed, as specified In Table 3-2, Land Uses by Land Use Designation, in Recirculated Chapter 3, Project Description, of the Draft EIR. As identified within Table 3-2, Research and Development uses are permitted within Business Park, Industrial, and Mixed Use areas on the Project site. The Project does not have identified end-users and nothing under the proposed Project would preclude the development of campus facilities and research centers if there were an interest and need for these facilities within the Project area. Regarding housing, the Housing Element within the March JPA General Plan states, "The master base reuse plan for March does not create additional housing opportunities within the planning area due to incompatible land uses within the airfield, the need to focus on the reestablishment of the numerous jobs lost due to base realignment, and the housing rich environment of Western Riverside County."

A-10.10 This comment expresses general opposition to the Project. This comment does not raise any specific comments or questions about the analysis within the Draft EIR.

[7] https://www.dmv.ca.gov/portal/dmv-research-reports/department-of-motor-vehicles-dmv-performance-reports/where-did-your-2020-fees-go/

CAL FIRE – RIVERSIDE UNIT
RIVERSIDE COUNTY FIRE DEPARTMENT

BILL WEISER - FIRE CHIEF
Office of the County Fire Marshal
77933 Las Montañas Rd, Ste. 201, Palm Desert, CA 92211
(760) 863-8886 www.rvcfire.org

PROUDLY SERVING THE UNINCORPORATED AREAS OF RIVERSIDE COUNTY AND THE CITIES OF:

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COACHELLA
DESERT HOT SPRINGS
EASTVALE
INDIAN WELLS
INDIO
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LAKE ELSINORE
LA QUINTA
MENIFEE
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PERRIS
RANCHO MIRAGE
RUBIDOUX CSD
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DR. YXSTIAN GUTIERREZ
DISTRICT 5

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Power Authority
23555 Meyer Drive
Riverside, CA 925018

RE: SP 21-01 (FPEIR2100105) – MJPA: West Campus Upper Plateau – 42.22 acres of mixed use, 65.32 acres of business park, 143.31 acres of Industrial, 78 acres of park, recreation and open space and 2.87 acres of public facilities

Riverside County Fire Department, Strategic Planning has reviewed the West Campus Upper Plateau Specific Plan. We ask that the following be added:

This project will contribute to a cumulative adverse impact on the Fire Department's ability to provide an acceptable level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, traffic, and population.

Cal Fire/Riverside County Fire Department provides Cooperated Integrated Regional fire protection services to the project. The nearest Cal Fire/Riverside County Fire Station is outside an acceptable estimated response distance and response drive time to all or a portion of the project.

Mitigation for these issues would be the construction of a future fire station and the purchase of fire response equipment to ensure that all hazard mitigated, and response needs are met. The developer, MJPA, and the Riverside County Fire department will work jointly to determine the timing and implementation of the station and apparatus.

A-11.1

In regard to other Fire Department required infrastructure, prior to Building Permit issuance, the required water system, including all fire hydrant(s), shall be installed and accepted by the appropriate water agency and the Riverside County Office of the Fire Marshal, prior to any combustible building materials being placed on the project. Additionally, Fire Department emergency vehicle apparatus access road locations and design shall be in accordance with the current California Fire Code and Riverside County Fire Department Standards.

We appreciate the opportunity to work together to ensure fire, rescue, medical and all hazard emergency services are provided to all of our residents If we can be of any further assistance, please feel free to contact the Riverside County Fire Department, Office of the Fire Marshal, Strategic Planning at (760) 863-8886 or RRUStrategicPlanning@fire.ca.gov

Sincerely,

Sonia Cooley

Sonia Cooley
Deputy Fire Marshal

CAL FIRE – RIVERSIDE UNIT
RIVERSIDE COUNTY FIRE DEPARTMENT

BILL WEISER - FIRE CHIEF
Office of the County Fire Marshal
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V. MANUEL PEREZ
DISTRICT 4

DR. YXSTIAN GUTIERREZ
DISTRICT 5

April 29, 2023

Dan Fairbanks, Planning Director
March Joint Power Authority
23555 Meyer Drive
Riverside, CA 925018

RE: SP 21-01 (FPEIR2100105) – MJPA: West Campus Upper Plateau – 42.22 acres of mixed use, 65.32 acres of business park, 143.31 acres of Industrial, 78 acres of park, recreation and open space and 2.87 acres of public facilities

The Riverside County Fire Department provides Cooperated Integrated Regional fire protection services to the project and March JPA area. Riverside County Fire Department, Strategic Planning has reviewed the West Campus Upper Plateau Specific Plan, and engaged in discussions with March JPA staff and the developer as to how to best address fire service needs.

The nearest existing Cal Fire/Riverside County Fire Station is outside an acceptable estimated response distance and response drive time to all or a portion of the project.

Based on Riverside County Fire Department's discussion with the March Joint Power Authority, we understand the West Campus Upper Plateau Project Development Agreement will include the construction of the previously planned and analyzed North Campus fire station. County Fire will use this facility to provide emergency services to our community, and the provision of this facility will address any project impacts and provide the needed level of service for fire protection. This proposed facility will also serve other existing or future development with the March JPA service area, addressing cumulative needs.

A-11.2

In regard to other Fire Department required infrastructure, prior to Building Permit issuance, the required water system, including all fire hydrant(s), shall be installed and accepted by the appropriate water agency and the Riverside County Office of the Fire Marshal, prior to any combustible building materials being placed on the project. Additionally, Fire Department emergency vehicle apparatus access road locations and design shall be in accordance with the current California Fire Code and Riverside County Fire Department Standards.

We appreciate the opportunity to work together to ensure fire, rescue, medical and all hazard emergency services are provided to all of our residents If we can be of any further assistance, please feel free to contact the Riverside County Fire Department, Office of the Fire Marshal, Strategic Planning at (760) 863-8886 or RRUStrategicPlanning@fire.ca.gov

Sincerely,

Geoffrey Pemberton
Chief Deputy

Letter A-11

Riverside County Fire Department
March 10, 2023

A-11.1 This comment states that the Project would result in the need for a new fire station. In response to this comment, please see Recirculated Chapter 3, Project Description, and Topical Response 6 – Meridian Fire Station, which discusses how the environmental clearance of a new fire station has already been completed and how the Project would construct the new fire station.

A-11.2 This comment is a clarification letter from Riverside County Fire Department and acknowledges that the Project will construct the new Meridian Fire Station. For additional information, please see Recirculated Chapter 3, Project Description, and Topical Response 6 – Meridian Fire Station.

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9.3 Organization Responses to Comments

Comment Letter	Name	Date
Organizations		
O-1	Canyon Hills HOA	2/23/2023
O-2	League of Women Voters Riverside	3/7/2023
O-3	Blum Collins & Ho	3/3/2023
O-4	Stone Creek Residents for Smart Growth	3/1/2023
O-5	Sierra Club	3/9/2023
O-6	Sierra Club (2)	3/9/2023
O-7	Redford Conservancy at Pitzer College	3/9/2023
O-8	Shute, Mihaly & Weinberg (RNOW)	3/10/2023
O-9	Southwest Carpenters	3/10/2023
O-10	Riverside Neighborhood Partnership	3/10/2023

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Comment Letter O-1

Canyon Hills of Riverside Homeowners Association

February 23, 2023

March Joint Powers Authority
Attention: Dan Fairbanks, Planning Director
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

SUBJECT: Response to the EIR for the West Campus Upper Plateau Project. SCN 2021110304

Dear Mr. Fairbanks:

We are limiting our comments to one section of the EIR: Section 4.9 Hydrology and Water Quality. Our subdivision (Tract 9565) was approved in 1979 by the City of Riverside. The tract map includes 1,000 linear feet of the Tequesquite Arroyo between Sycamore Canyon Wilderness Park and the Canyon Crest Country Club (APN 253-280-069.) As shown in Table 4.9.1 of the EIR, watersheds 3 -12 run through the Tequesquite Arroyo to the Santa Ana River. When the City adopted Tract Map 9565, it transferred responsibility for that portion of the Tequesquite Arroyo to our HOA. Initially, this section of the Arroyo was generally devoid of living plant material with water flowing only during seasonal rain events. Subsequent development on the edges of Sycamore Canyon Wilderness Park with its resulting urban runoff has turned our section of the Arroyo into a vegetated area with trees and plants that stay green all 12 months of the year. The vegetation has impacted the drainage patterns of the water flow during storm events. Significant erosion is already threatening the stability of one of the slopes on which some of the homes in the HOA are built. The cost to obtain environmental permits and to fix the erosion, prevent further erosion, and maintain our 1,000 linear feet of the Tequesquite Arroyo is in the tens of thousands of dollars. We have appealed to the City, the County, the State, and environmental organizations for financial assistance with no success. All parties agree that our HOA should not have been given responsibility for flood control operations but are not willing to fix the error.

O-1.1

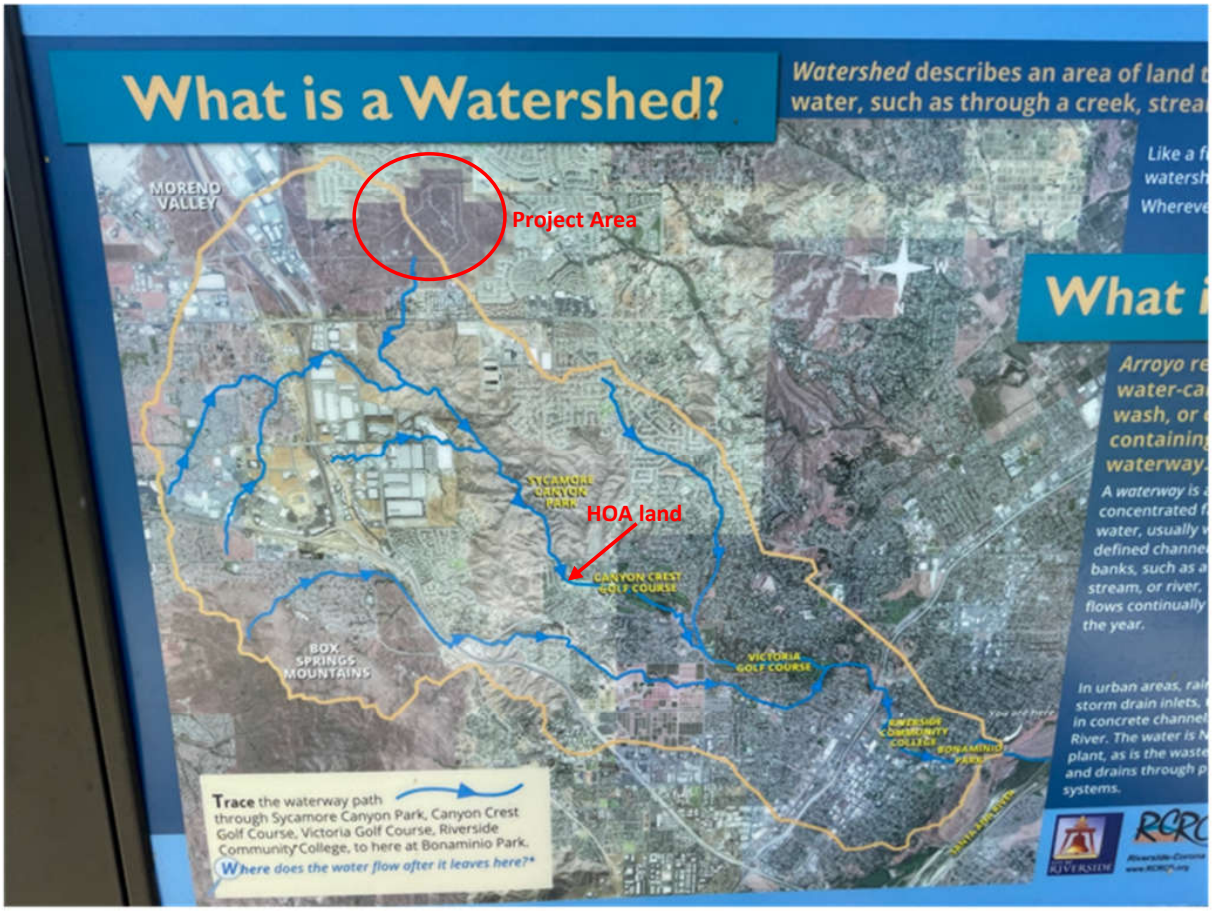
Our concern is that the proposed project will be adding urban runoff to an already impacted system. The EIR states that a Water Quality Management Plan (WQMP) will be prepared to, among other things, reduce downstream erosion. That is the same requirement imposed on other upstream development projects when they were constructed, but the water flow increased significantly anyway. There is no way to stop all urban runoff from the proposed project. Our HOA is struggling under our current situation. We are opposed to any development that contributes to urban runoff and increases erosion and flood hazards through our section of the Tequesquite Arroyo as shown on the attached map.

Sincerely,

The Board of Directors
Canyon Hills of Riverside Homeowners Association

Canyon Hills HOA | Condominium Management Services | 675 W. Foothill Blvd., Suite 104 | Claremont CA 91711
909-399-3103, ext. 362 | evelyn@cmsmgmt.com

Canyon Hills of Riverside HOA Locational Map



O-1.1
Cont.

Letter O-1

Canyon Hills HOA
February 23, 2023

O-1.1 This comment raises concerns regarding the Project's hydrological impacts to the portion of the Tequesquite Arroyo maintained by the commenting HOA. The comment also includes a map showing the Project site relative to the HOA area. As explained in the DRC Hydrology Responses to Comments (Appendix K-7), a portion of the proposed Project is within or near to a tributary to the existing wash running through Sycamore Canyon Park. The proposed Project is designed to maintain an equivalent amount of land area that is currently draining through this watershed. The area of land tributary to each existing watershed will be remain the same in the existing and proposed condition within tolerance.

Industry practice within March JPA and the County of Riverside is to detain stormwater runoff so that the proposed Project does not increase the peak discharge rate as compared to undeveloped condition for the design storm events (100 Year – 24 Hour and 2 Year – 24 Hour design storm events). Prior to development (i.e., the creation of impervious surfaces), the undeveloped portions of the Project will utilize desilting basins as outlined by the California Stormwater Quality Association (CASQA) Best Management Practices (BMP) Handbook for desilting basins. Attached is Figure O-1.1 for reference. The desilting basin is not a runoff reduction device and is instead for erosion/sediment control for undeveloped parcels. (Appendix K-7)

Figure O-1.1. Typical Temporary Desilting Basin Design

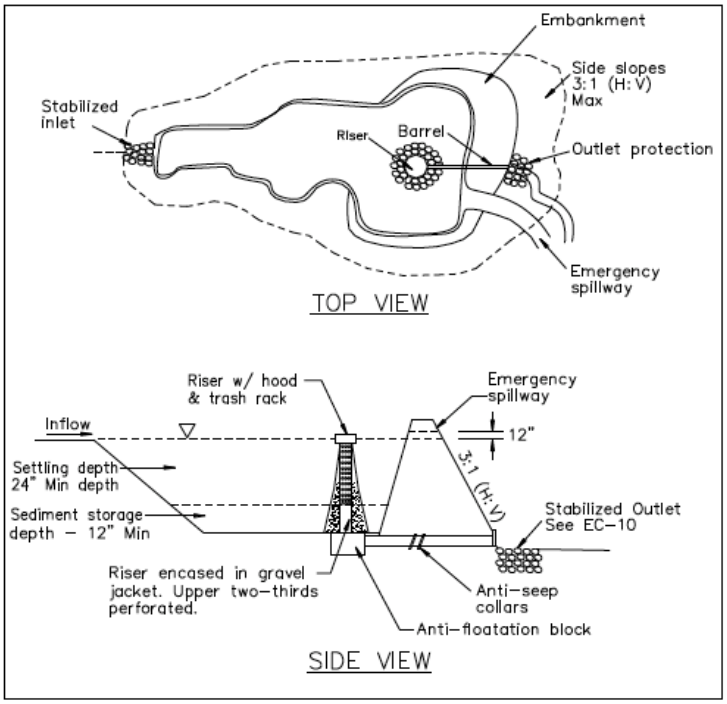


FIGURE 1: TYPICAL TEMPORARY SEDIMENT BASIN
MULTIPLE ORIFICE DESIGN
NOT TO SCALE

The proposed Project will utilize stormwater storage solutions and outlet controls to detain runoff in the design storm events down to the undeveloped peak flow rates. Examples of stormwater storage solutions include, but are not limited to, underground pipes, underground vaults, shallow surface ponding. Each site plan within the Project will be required to mitigate runoff as each parcel develops. See the Hydrology studies included in Appendices K-1, K-5, and K-6 of the EIR. (Appendix K-7)

As stormwater discharges from the overall Project (typically at the boundaries of the Project as shown in the hydrology studies included in Appendix K-1 of the EIR) the Project will reduce peak discharge velocities to a non-erosive velocity as it crosses the Project property line at existing drainage points. (Appendix K-7)

The portion of the Tequesquite Arroyo identified in the comment is approximately 3 miles north of the Project site. Given intervening terrain, drainage, and percolation, it would be speculative to attempt to determine the amount of the Project site's discharge that would ultimately flow through Tequesquite Arroyo. As explained above, the velocity of water discharge will not increase. (Appendix K-7)

Comment Letter O-2



March 6, 2023

Joan Donahue, President
League of Women Voters Riverside
Post Office Box 20785
Riverside, CA 92516-0785
Donahue.joan@att.net

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

The League of Women Voters Riverside writes in support of a letter sent to your office from Vicki Broach, a long-time League Member and former staff attorney for the state Court of Appeal. Ms. Broach has 20 years of experience conducting appellate review of CEQA cases. We strongly support Ms. Broach's opinion that the EIR in its present draft form will receive an unfavorable review by the Superior Court and the Court of Appeal. O-2.1

Air quality impacts The negative effects on air quality caused by warehouses and the truck trips they generate are well documented. Strikingly, diesel PM accounts for 70% of cancers attributable to toxic air contaminants. Local residents are legitimately worried about the health effects for themselves, their families, and their community. O-2.2

Land Use and Planning, Population and Housing Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project. Clearly, community feedback is not being "seriously" and "carefully" considered. O-2.3

The historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never

considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings.

Moreover, all March JPA planning documents indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

O-2.3 Cont.

The Draft EIR acknowledges the City of Riverside is mandated by state law to provide adequate housing. But it does not recognize that the City is failing to meet its state-mandated goals. The EIR should be corrected to reflect honestly the challenges presented by increasing the number of employees in an area that already lacks sufficient housing for its citizens.

O-2.4

Transportation In its present form, the Draft EIR is deficient in its traffic analysis. The analysis does not account for the 215/60 freeway corridor, which is within one mile of the site and would necessarily be the route the trucks would use.

The Final EIR should include consultation with CalTrans as part of its traffic analysis of the 215/60 corridor to reflect the reality of the impact of the project on the local area. The Final EIR should also include a plan for enforcement and maintenance that does not shift the burden to local jurisdictions and includes mitigation measures requiring the tenants to pay an infrastructure fee to local jurisdictions for the cost to our roads and to our police forces.

O-2.5

Job creation claims The claims about job creation are dubious. According to the Southern California Association of Governments Economic Report (SCAG), job growth in the Inland Empire since 2001 has resulted in numerous jobs but they tend to be relatively lower paying compared to other parts of the state and nation.

The report also discusses how the logistics industry "will likely go through a transformation as advances in automation and artificial intelligence displace workers." It warns: "There will be further costs from the expansion of the Logistics Sector if the result of the expansion means that there will be less industrial space available in the future for industries which are able to add more value to the economy per square foot."

O-2.6

League of Women Voters Riverside finds the Draft EIR is legally insufficient for multiple reasons. We urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. We also encourage the developer to consider non-industrial, alternative uses of the land for the sake of all Riverside city and county residents, as well those living adjacent to the site.

Sincerely,

Joan Donahue, President
League of Women Voters Riverside
(951) 479-2090
Donahue.joan@att.net

Letter O-2

League of Women Voters Riverside
March 7, 2023

O-2.1 This comment is introductory in nature and does not raise any specific issues or questions on the adequacy of the environmental analysis included in the Draft EIR.

O-2.2 This comment states that local residents are worried about air quality impacts and the associated health effects associated with warehouses and truck trips. Recirculated EIR Section 4.2, Air Quality, and Appendix C-2 assess the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR) located 32 feet from construction activities), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts identified in the Draft EIR.

O-2.3 The comment references Planning Process C1F, which is a specific sentence and planning assumption outlined in the planning process used to create the Final Reuse Plan. The comment also questions public engagement. March JPA used Planning Process C1F to develop the Preferred Land Use Plan outlined in the Final Reuse Plan. The March JPA General Plan was then developed based on that Preferred Land Use Plan. The March JPA General Plan includes warehousing in the definition of

Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the project site resulting in 2,172 public notices.

This comment further references the Final Reuse Plan and the March JPA General Plan and states "warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning." The comment also references the draft update to the March JPA General Plan but this document was never adopted. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of Recirculated Chapter 3, Project Description. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.

Further, as detailed in the Recirculated Section 4.10, Land Use and Planning, the Project is consistent with the Good Neighbor Guidelines for the County of Riverside. The Project's consistency with the City of Riverside Good Neighbor Guidelines is discussed in Topical Response 4 – Project Consistency. The purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

O-2.4 This comment states that the Draft EIR does not recognize that the City of Riverside is failing to meet its state mandated goal of providing adequate housing. This comment does not relate to the proposed Project, which is in the jurisdiction of March JPA. March JPA does not have any land use authority over the City of Riverside or its ability to provide adequate housing, as required by State law. However, for additional information about jobs, and unemployment, see Topical Response 5 – Jobs.

O-2.5 This comment states that the Draft EIR is deficient in its traffic analysis as it does not account for the 215/60 freeway corridor. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), March JPA has adopted its own guidelines for traffic analysis: the March

JPA Traffic Impact Study Guidelines, dated February 10, 2020 (March JPA Guidelines). Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. As such, to comply with CEQA, Caltrans does not utilize peak hour intersection operations analysis and instead utilizes VMT in compliance with SB 743 through its VMT-Focused Transportation Impact Study Guide (Caltrans VMT Guide), dated May 20, 2020. The March JPA Guidelines were adopted before the Caltrans VMT Guide and therefore the reference is now-superseded Caltrans guidance. The Project VMT Analysis (Appendix N-1) was prepared in compliance with the Caltrans VMT Guide and meets the current transportation analysis requirement for Caltrans. Caltrans was notified about the Project through the release of the Notice of Preparation on November 18, 2021. Caltrans also received the Notice of Availability for the Draft EIR when the document was circulated for public review beginning on January 9, 2023. No comments were provided by Caltrans during the scoping period or public review for the Project.

Pursuant to Caltrans safety requirements, the Project Traffic Analysis (Appendix N-2) included an assessment of the I-215 off-ramps at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard to ensure there is no queuing, or back-up, onto the freeway mainline. These I-215 off-ramps were selected because the Project is anticipated to contribute 50 or more peak hour trips to these off-ramp intersections, consistent with the March JPA Guidelines. The Project Traffic Analysis (Appendix N-2) performed a queuing analysis for these I-215 Freeway off-ramps for all scenarios (Existing [2021], Existing plus Project, Existing plus Ambient Growth plus Project, Opening Year [2028] Cumulative Without Project, Opening Year [2028] With Project, Horizon Year [2045] Without Project, and Horizon Year [2045] With Project). Based on the results of this queuing analysis, there are no study area off-ramps that are anticipated to experience queuing issues under any scenario. Caltrans is one of the state reviewing agencies for the Project, and had the opportunity to comment on the transportation analysis. https://ceqanet.opr.ca.gov/2021110304. Caltrans did not submit any comments on this Project.

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

The comment also raises concerns about enforcement and maintenance. In response to truck route enforcement concerns, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13,

Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As has been the case with other areas in the Meridian Business Park, as the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they are also separate conditions of approval and also included in the MMRP. March JPA will monitor compliance through the MMRP. Regarding maintenance concerns, commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[1]

O-2.6 This comment questions the actual number of jobs that would be provided by the proposed Project. In response to this comment, please see Topical Response 5 - Jobs, for a discussion about how the number of jobs for the Project was calculated. The comment raises concerns regarding automation. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. The comment further requests consideration of a non-industrial alternative. In response to this comment, please see Topical Response 8–- Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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

BLUM, COLLINS & HO LLP
ATTORNEYS AT LAW
AON CENTER
707 WILSHIRE BOULEVARD
SUITE 4880
LOS ANGELES, CALIFORNIA 90017
(213) 572-0400

March 3, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

VIA EMAIL TO:
fairbanks@marchjpa.com

SUBJECT: COMMENTS ON WEST CAMPUS UPPER PLATEAU EIR (SCH NO. 2021110304)

Dear Mr. Fairbanks:

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed West Campus Upper Plateau Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. 0-3.1

1.0 Summary

The project proposes to implement a new Specific Plan with a buildout scenario including 10 Business Park parcels totaling 65.32 acres, 6 Mixed Use parcels totaling 42.22 acres, 3 Industrial parcels totaling 143.31 acres, 2 Public Facility parcels totaling 2.84 acres, 3 open space parcels totaling 17.72 acres and public streets totaling 37.91 acres. Plot Plans for Buildings B and C totaling 1,837,000 square feet would be constructed on two of the Industrial Parcels.

The following discretionary actions are required for project approval: 0-3.2

1. General Plan Amendment 21-01: The Project proposes to amend the site's General Plan Land Use designations as follows:
   - Increase Parks, Recreation, and Open Space (P/R/OS) from approximately 122 gross acres to 523.43 gross acres.3
   - Eliminate approximately 622.5 gross acres of Business Park designated property.

- Eliminate approximately 63 gross acres of Industrial designated property.
- Adopt the Meridian West Upper Plateau Specific Plan (SP-9) on approximately 369.60 gross acres, approving a mix of Business Park, Industrial, Mixed Use, Public Facility, Streets, and Open Space land uses.
- Amend the General Plan from Business Park to Public Facility on 2.87 acres to accommodate an existing water storage tank operated by EMWD. In addition, the approximately 445-acre Conservation Easement will be recorded as a permanent Conservation Easement. The amendment would modify the General Plan Land Use Plan, Table 1-1 (March JPA Planning Build Out); Exhibit 2-1, Transportation Plan; and Exhibit 2-3, Transportation Road Systems (March JPA 1999). The amendment to the Transportation Element of the General Plan will incorporate the following changes: Extend Cactus Avenue west to Airman Drive, with a gated emergency vehicle access roadway extending to Barton Street. Extend Barton Street from Alessandro Boulevard to Grove Community Drive. Extend Brown Street from Alessandro Boulevard to Cactus Avenue. Add Arclight Drive, Linebacker Drive, Bunker Hill Drive, and Airman Drive.

2. Specific Plan 21-01 (SP-9): The Project proposes adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13 containing development standards, design guidelines, infrastructure master plans, maintenance responsibilities, phasing schedule, and implementation procedures necessary to develop the Project site consistent with the requested General Plan Amendment designations. The proposed Specific Plan will address land uses, zoning, and design guidelines. The proposed land uses within Specific Plan SP-9 include the following:
   - 42.22 acres of Mixed Use
   - 65.32 acres of Business Park
   - 143.31 acres of Industrial
   - 37.91 acres of streets and roadways
   - 78 acres of undeveloped Parks/Recreation/Open Space
   - 2.84 acres of Public Facility
   - Total gross acreage = 369.60

O-3.2
Cont.

3. Zoning Designation: The Project site, including both the Specific Plan Area and Conservation Easement, has not previously been given a zoning designation; therefore, the Project proposes zoning consistent with the requested Specific Plan designations of Mixed Use (MU), Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility (PF) for the Specific Plan Area, Parks/Recreation/Open Space (P/R/OS) for the Conservation Easement, and Public Facility for the existing EMWD water tank.

4. Tentative Parcel Map 38063: Concurrent with the General Plan and Zoning Amendments, the Specific Plan, and the Plot Plans, approval of a Tentative Parcel Map is required for the Specific Plan boundaries. Following the approval of Tentative Parcel Map, a Final Map would

become the legal document that identifies developable parcels within the Specific Plan area. See Figure 3-8, Tentative Parcel Map, for more details.

5. Plot Plans 21-03 and 21-04: Concurrent with the General Plan and Zoning Amendments, the Specific Plan, and the Tentative Parcel Map, plot plan approvals are required to construct an approximately 1,250,000-square-foot industrial building on 59.55 acres at 20133 Cactus Avenue and a 587,000-square-foot industrial building on 27.49 acres at 20600 Cactus Avenue. Plot Plans for each of these proposed buildings are included as Figure 3-9, Plot Plan – Building B, and Figure 3-10, Plot Plan – Building C.

6. Development Agreement 21-01: Due to the scale and complexity of the proposed Project, a Development Agreement is proposed to vest the Project entitlements and fees, ensure financing of public improvements required by the conditions of approval, and provide certain Community Benefits including compliance with the terms of the CBD Settlement Agreement (Appendix S), and provision of new public benefits, including, but not limited to, expansion of employment opportunities for area residents. The Development Agreement is proposed between March JPA and Meridian Park LLC with a 15-year term and two potential 5-year extensions.

O-3.2 Cont.

The EIR assumes the following buildout of the Development Area for analysis:

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1, 280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facilities – 2.84 acres for future sewer lift station and electrical substation

3.0 Project Description

The EIR does not include the proposed West Campus Upper Plateau Specific Plan document as an attachment for public review. The West Campus Upper Plateau SP would include permitted uses and development standards such as maximum height, floor area ratio, parking requirements, and other items that contribute directly to the analysis of environmental impacts. Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the West Campus Upper Plateau SP contributes directly to analysis of the problem at hand. The EIR must be revised and recirculated to include the Beaumont Pointe SP document for public review in order to comply with CEQA's

O-3.3

requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)).

O-3.3 Cont.

4.2 Air Quality, 4.5 Energy, and 4.7 Greenhouse Gas Emissions

O-3.4

Please refer to attachments from SWAPE for a complete technical commentary and analysis.

O-3.5

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0[1], CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6065046700) and surrounding community, including residences immediately adjacent to the north, south, and west of the Specific Plan area, bears the impact of multiple sources of pollution and ranks worse than 95% of the rest of the state overall in overall pollution burden.

O-3.6

For example, the project census tract ranks in the 98th percentile for ozone burden, 60th percentile for particulate matter (PM) 2.5 burden, 40th percentile for diesel PM burden, and 82nd percentile for traffic burdens. All of these environmental factors are typically attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[2]. The very small particles of diesel PM can reach deep into the lung, where they can contribute to a range of health problems. These include irritation to the eyes, throat and nose, heart and lung disease, and lung cancer[3].

The census tract ranks in the 71st percentile for contaminated drinking water and 98th percentile for groundwater threats. Poor communities are exposed to contaminants in their drinking water more often than people in other parts of the state[4]. People who live near contaminated groundwater may be exposed to chemicals moving from the soil into the air inside their homes[5].

The census tract also bears more impacts from cleanup sites than 83% of the state. Chemicals in the buildings, soil, or water at cleanup sites can move into nearby communities through the air or movement of water[6].

[1] CalEnviroScreen 4.0 https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[2] OEHHA Ozone https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[3] OEHHA Diesel Particulate Matter https://oehha.ca.gov/calenviroscreen/indicator/diesel-particulate-matter
[4] OEHHA Contaminated Drinking Water https://oehha.ca.gov/calenviroscreen/drinking-water
[5] OEHHA Groundwater Threats https://oehha.ca.gov/calenviroscreen/indicator/groundwater-threats
[6] OEHHA Cleanup Sites https://oehha.ca.gov/calenviroscreen/indicator/cleanup-sites

The census tract also ranks in the 85th percentile for solid waste facility impacts and 88th percentile for hazardous waste facility impacts. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilites are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations[7]. Hazardous waste generators and facilities contribute to the contamination of air, water and soil near waste generators and facilities can harm the environment as well as people[8].

Further, the census tract is a diverse community including 72% Hispanic and 8% African-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 82% of the census tract over age 25 has not attained a high school diploma. The community also has a high rate of poverty, meaning 89% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care[9]. Poor communities are often located in areas with high levels of pollution[10]. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution[11]. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 87th percentile for incidence of cardiovascular disease and 72nd percentile for incidence of asthma. The community also has a high rate of linguistic isolation, meaning 83% of the census tract speaks little to no English and faces further inequities as a result.

O-3.6 Cont.

Additionally, the proposed project's census tract (6065046700) and the census tracts adjacent to the project site (6065042010 (south) and 6065042505 (north)) are identified as SB 535 Disadvantaged Communities[12]. This indicates that cumulative impacts of development and environmental impacts in the area are disproportionately impacting these communities. The EIR does not discuss that the project site and surrounding area are disadvantaged communities and does not utilize this information in its analysis. The EIR has not considered the environmental impacts in relation to the SB 535 status of the project census tract and surrounding area. The negative environmental, health, and quality of life impacts of the warehousing and logistics industry in the area have become distinctly inequitable. The severity of environmental impacts particularly on these Disadvantaged Communities must be included for analysis as part of an revised EIR.

O-3.7

[7] OEHHA Solid Waste Facilities https://oehha.ca.gov/calenviroscreen/indicator/solid-waste-sites-and-facilities
[8] OEHHA Hazardous Waste Generators and Facilities https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities
[9] OEHHA Poverty https://oehha.ca.gov/calenviroscreen/indicator/poverty
[10] Ibid.
[11] Ibid.
[12] OEHHA SB 535 Census Tracts https://oehha.ca.gov/calenviroscreen/sb535

California's Building Energy Code Compliance Software (CBECC) is the State's only approved energy compliance modeling software for non-residential buildings in compliance with Title 24[13]. CalEEMod is not listed as an approved software. The CalEEMod-based modeling in the EIR and appendices does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the MND did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling using the approved software (CBECC) must be circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not the approved software.

0-3.8

Further, 4.7-5. Project Consistency with the SCAG Connect SoCal RTP/SCS finds that the project does not conflict with all goals of Connect SoCal, resulting in less than significant impacts. However, the consistency analysis in the EIR is misleading to the public and decision makers. The project results in several significant and unavoidable cumulatively considerable impacts, including Air Quality and Noise. For example, the EIR finds the project is consistent with Goal 5: "Reduce greenhouse gas emissions and improve air quality." However, as determined in the EIR itself, the project will impede the SCAG region's ability to reduce greenhouse gas emissions and improve air quality because it will result in significant and unavoidable cumulatively considerable impacts to Air Quality. Additionally, due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter and attachments, the proposed project is directly inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. This information must be included for analysis with all Connect SoCal Goals and a finding of significance must be made in a revised EIR, including analysis discussing the project's impacts on the SB 535 Disadvantaged Communities.

0-3.9

4.8 Hazards and Hazardous Materials

The proposed project site is within March Air Reserve Base (MARB)/Inland Port Airport Primary Approach/Departure Zone (Compatibility Zone C1) and C2 Compatibility Zone. The EIR states

0-3.10

[13] California Energy Commission 2022 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1

that "The Riverside County ALUC has reviewed the Project and found it to be consistent with the ALUCP provided that certain conditions as stipulated in their May 16, 2022 letter are met." Condition #13 from the RCALUC letter states[14] the following:

"13. In the event the future BASH study, as prepared by a qualified wildlife hazard biologist, raises significant issues, that the study shall come back to the ALUC for review."

Section 4.8.3 of the EIR states that Appendix J-4 is a "wildlife hazard review prepared for the project, also known as a Bird/Wildlife Aircraft Strike Hazard (BASH) study." Appendix J-4 is dated June 28, 2022, confirming that it was not reviewed by RCALUC at their May 12, 2022 meeting to review the proposed project. Page 13 of the BASH study states the following regarding the Open Space - Conservation area:

"The proposed project is consistent with many policies associated with aviation guidance related to safety and hazardous wildlife management, but several inconsistencies were identified. Moreover, the majority of the Plan Area will be used for Open Space - Conservation in accordance with the 2012 Settlement Agreement for the purpose of habitat conservation, and a permanent conservation easement will be placed on the property. The proposed Open Space - Conservation Area will require the development of passive trails and periodic maintenance. Such activities will be undertaken in accordance with the Specific Plan. However, **a permanent conservation easement may be inconsistent with ongoing aircraft operations unless specific provisions are included to address the presence of hazardous wildlife attractants that may require modification to support the ongoing Military Mission at March ARB, as stated in the March JPA General Plan.** At this time, specific plans/designs for the Open Space - Conservation Area are not available.

O-3.10 Cont.

FAA AC 150/5200-33C identifies conservation areas and wildlife management areas as having the potential to attract hazardous wildlife. The implementation of habitat enhancements and the establishment of a permanent conservation easement may attract hazardous wildlife to the aircraft operations area and the AIA for March ARB. The AC states that a QAWB should evaluate proposed mitigation projects before the mitigation is implemented, and "Regardless of the source of the attraction, when hazardous wildlife is noted on a public-use airport, the airport operator should take prompt remedial action(s) to protect aviation safety."

Recommendations: The following items should be incorporated into the Specific Plan to promote ongoing safety of aircraft operations at March ARB:

[14] RCALUC Agenda Item 3.5 https://www.rcaluc.org/Portals/13/aluc_agenda_05-12-22.pdf?ver=2022-05-02-101625-183

- Design plans for the development of the proposed Open Space - Conservation Area shall be reviewed by a QAWB for their consistency with the 2018 AICUZ, ALUCP, FAA guidance, and the current BASH Plan for March ARB. Inconsistent items should be revised to address the safety of ongoing aircraft operations.
- A proposed permanent conservation easement shall be reviewed by an Aviation Planner and QAWB to identify potential conflicts for ongoing aircraft operations and the Military Mission at March ARB. If potential conflicts are identified, safety concerns shall prevail.
- In the event that the conditions within the Plan Area, including areas within conservation easements, are identified as attracting potentially hazardous wildlife or increasing wildlife risks to aircraft operations, the land use, easement, and conservation practices shall be modified to remove the hazard. In the event that the remedial action conflicts with the conservation goals, safety concerns shall prevail."

O-3.10 Cont.

The above items are significant issues and the project must go back to RCALUC for review pursuant to RCALUC Condition #13. The BASH study is dated June 28, 2022, so it was not reviewed by RCALUC at their May 12, 2022 meeting to review the project. Most notably, the above recommendations from the BASH study are **NOT** incorporated as mitigation measures/project design features even though others from the study are included as such in the EIR. The EIR cannot conclude that the project will have less than significant impacts until and unless the project and the June 28, 2022 BASH study are reviewed again by the RCALUC in accordance with Condition #13.

4.10 Land Use and Planning

The EIR does not provide an erroneous and misleading consistency analysis with all land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The project is directly inconsistent with the following from the General Plan:

1. Noise/Air Quality Element Goal 3: Reduce air pollution through proper land use, transportation, and energy use planning.

2. Noise/Air Quality Element Goal 8: Reduce air pollution emissions and impacts through siting and building design.

O-3.11

The EIR is erroneous in concluding that the project is consistent or partially consistent with these goals. The EIR concludes the project will have a significant and unavoidable impact to Air Quality, and therefore the EIR cannot simultaneously conclude that the project is consistent with General Plan goals related to reducing air pollution. The EIR must be revised to include this information for analysis and a finding of significance due to these inconsistencies.

4.12 Population and Housing

The EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impact to population and housing. The EIR states that "the Project is anticipated to generate approximately 2,600 full-time jobs, which *could* be filled by existing residents of the County." Relying on the workforce population of the entire Riverside County area will increase project related VMT and emissions during all phases of construction and operations and an EIR must be prepared to account for longer worker trip distances. The EIR also does not provide evidence that the Riverside County workforce is qualified for or interested in industrial work to substantiate this claim. 0-3.12

The EIR also does not provide a source methodology or calculation to support the claim that the project will only generate 2,600 operational employees. SCAG's Employment Density Study[15] provides the following applicable employment generation rates for Riverside County: 0-3.13

Warehouse: 1 employee per 581 square feet
Retail: 1 employee per 629 square feet

Applying these ratios results in the following calculation:

Warehouse: 4,825,729 sf / 581 = 8,306
Retail: 160,921 sf / 629 sf = 256
Total: 8,562 employees

Utilizing SCAG's Employment Density Study ratios, the proposed project will generate 8,562 employees. The MND utilizes uncertain and misleading language which does not provide any meaningful analysis of the project's population and employment generation. In order to comply with CEQA's requirements for meaningful disclosure, a revised EIR must be prepared to provide an accurate estimate of employees generated by all uses of the proposed project. It must also provide demographic and geographic information on the location of qualified workers to fill these positions. The revised EIR must also include a quantified construction employee analysis, including their geographic locations. 0-3.14

The EIR must be revised to provide a cumulative analysis discussion of projects approved and projects "in the pipeline" to determine if the project will exceed the General Plan employment and/or population growth forecast. For example, other recent industrial projects such as Veterans 0-3.15

[15] SCAG Employment Density Study
http://www.mwcog.org/file.aspx?A=QTTlTR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D

Industrial Park 215 (3,820 employees) and South Campus Specific Plan (8,142 employees) combined with the proposed project will cumulatively generate 20,524 employees. This total increases exponentially when other development projects are added to the calculation. The EIR must be revised to include this information for analysis and also include a cumulative development analysis of projects approved and projects "in the pipeline" to determine if the proposed project exceeds the General Plan growth estimates and/or SCAG's growth forecasts for the area.

0-3.15 Cont.

Further, the EIR states that "the State of California's HCD, in recognition of the unique governance and responsibilities of March JPA and the adequacy of housing sites within the member jurisdictions, has resolved that incorporation by reference of the four housing elements complies with the guidelines and requirements of a Housing Element." However, the EIR has not included a letter of confirmation from HCD as an attachment for public review to support this claim. In order to comply with CEQA's requirements for meaningful disclosure and provide an adequate environmental analysis, the EIR must be revised to include documentation from HCD to support this claim.

0-3.16

5.0 Other CEQA Considerations

5.4 Significant Irreversible Changes

The EIR relies upon erroneous Energy modeling to determine that the project will meet sustainability requirements. As noted above, the EIR did not model the project's energy consumption in compliance with Title 24 modeling software. Further, the EIR states here that "the Project would be a relatively minor energy consumer compared to other local and regional users. Thus, the proposed energy consumption would not be considered a significant irreversible environmental effect," without providing a definition of "relatively minor" or the other "local and regional users" it compares the project to without quantification. The EIR also does not discuss the project's significant and unavoidable Air Quality impacts or the project's required changes in land use designations (General Plan Amendment and Zone Change). The EIR must be revised to include a finding of significance due to the project's significant and unavoidable Air Quality impacts and direct contribution to climate change.

0-3.17

0-3.18

5.5 Growth Inducing Impacts

The EIR does not meaningfully discuss or analyze the project's required land use designation changes (General Plan Amendment and Zone Change). A revised EIR must be prepared with information and analysis on the buildout conditions of the General Plan in order to provide an adequate and accurate environmental analysis.

0-3.19

The EIR does not adequately discuss or and analyze the commitment of resources is not consistent with regional and local growth forecasts. As noted throughout this comment letter, the project represents a significant amount of growth in the area and in tandem with only two other recent

0-3.20

industrial projects account for a significant amount of the area's employment growth over 29 years. The EIR must also include a cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting. The EIR utilizes the County of Riverside's employment growth forecast from SCAG 2016-2045 of 280,000 jobs to demonstrate that it will have less than significant impacts. However, it must provide a list of all employment generating projects approved since 2016 in all of Riverside County in order to substantiate this claim and demonstrate that cumulative development in Riverside County (including the proposed project) does not exceed SCAG's growth forecast.

0-3.20 Cont.

6.0 Alternatives

The EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the project (CEQA § 15126.6.) The alternatives chosen for analysis include the CEQA required "No Project" alternative and only three others - Reduced Development Alternative, Reduced Industrial Building Size Alternative, and Reduced Cultural Resource Impact Alternative. The EIR does not evaluate a reasonable range of alternatives as only three alternatives beyond the required No Project alternative is analyzed. The EIR does not include an alternative that meets the project objectives and also eliminates all of the project's significant and unavoidable impacts. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This could include alternatives such as development of the site with a project that reduces all of the proposed project's significant and unavoidable impacts to less than significant level, or a mixed-use project that provides affordable housing and local-serving commercial uses that may reduce VMT, GHG emissions, and improve Air Quality.

0-3.21

Conclusion

For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

0-3.22

Sincerely,



Gary Ho
Blum, Collins & Ho LLP

Attachment: SWAPE Analysis

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
(949) 887-9013
mhagemann@swape.com

Paul E. Rosenfeld, PhD
(310) 795-2335
prosenfeld@swape.com

March 3, 2022

Gary Ho
Blum Collins LLP
707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

Subject: Comments on the West Campus Upper Plateau Project (SCH No. 2021110304)

Dear Mr. Ho,

We have reviewed the January 2023 Draft Environmental Impact Report ("DEIR") for the West Campus Upper Plateau Project ("Project") located in the City of Encinitas ("City"). The Project proposes to construct 65.32-acres of business park space, 143.31-acres of industrial space, 42.22-acres of mixed-use space, 2.84-acres of public facilities, 78-acres of parks, and 37.91-acres of streets on the 818-acre site.

Our review concludes that the DEIR fails to adequately evaluate the Project's air quality and health risk impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. A revised EIR should be prepared to adequately assess and mitigate the potential air quality and health risk impacts that the Project may have on the environment.

0-3.23

Air Quality

Failure to Implement All Feasible Mitigation to Reduce Emissions

The DEIR concludes that the Project's operational air quality emissions would be significant-and-unavoidable. Specifically, the DEIR estimates that the Project's operational VOC, NO_X, CO, and PM_{10} emissions would exceed the applicable South Coast Air Quality Management District ("SCAQMD") thresholds of 55-, 55-, 550-, and 150-pounds per day ("lbs/day"), respectively (see excerpt below) (p. 4.2-28, Table 4.2-8).

0-3.24

Table 4.2-8. Summary of Project Operational Emissions

Source	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	174.00	308.00	2,148.00	6.90	233.00	46.30
Area Source	158.00	1.82	217.00	0.01	0.29	0.39
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
TRU Source	13.62	14.91	1.62	0.00	0.64	0.58
Total Maximum Daily Emissions	**345.62**	**324.73**	**2,366.62**	**6.91**	**233.93**	**47.27**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**No**
Winter						
Mobile Source	332.00	310.00	2,364.00	6.91	233.00	46.70
Area Source	122.00	0.00	0.00	0.00	0.00	0.00
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
TRU Source	13.62	14.91	1.62	0.00	0.64	0.58
Total Maximum Daily Emissions	**467.62**	**324.91**	**2,365.62**	**6.91**	**233.64**	**47.28**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**No**

Source: Appendix C-1.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; <0.01 = reported emissions are less than 0.01; SCAQMD = South Coast Air Quality Management District. Emissions include application of **PDF-AQ-4**, all electric cargo handling equipment, and no natural gas would be used on site.

0-3.24 Cont.

As such, the DEIR concludes that the impacts associated with Project operation would be significant-and-unavoidable, stating:

> "As discussed under Thresholds AQ-1 and AQ-2, the Specific Plan would exceed regional thresholds of significance established by the SCAQMD for VOC, NO_X, CO, and PM_{10} emissions; thus, the Specific Plan's unmitigated impacts would be potentially significant. The majority of the Specific Plan's operational VOC, NO_X, CO, and PM_{10} emissions would be derived from the mobile sources. The Specific Plan would implement MM-AQ-2 through MM-AQ-15 to reduce the Specific Plan's operational VOC, NO_X, CO, and PM_{10} emissions; however, there is no meaningful way to quantify these reductions in CalEEMod and therefore no numeric emissions credit was taken in the analysis. Therefore, the Specific Plan's operational VOC, NO_X, CO, and PM_{10} emissions would be significant and unavoidable, and would, therefore, per SCAQMD criteria, be cumulatively significant and unavoidable" (p. 4.2-39).

However, while we agree that the Project would result in significant air quality impacts, the DEIR's assertion that this impact is significant-and-unavoidable is incorrect. According to CEQA Guidelines § 15096(g)(2):

0-3.25

> "When an updated EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible

mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."

As such, the DEIR is required under CEQA to implement all feasible mitigation to reduce impacts to a less-than-significant level. While the DEIR implements Mitigation Measure ("MM") AQ-1 through MM AQ-15, the DEIR fails to implement *all* feasible mitigation (p. 4.2-35 – 4.2-38). Therefore, the DEIR's conclusion that Project's air quality emissions would be significant-and-unavoidable is unsubstantiated. To reduce the Project's air quality impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions." Thus, the Project should not be approved until a revised EIR is prepared, incorporating all feasible mitigation to reduce emissions to less-than-significant levels.

O-3.25 Cont.

Failure to Include PDFs as Mitigation Measures

According to the DEIR, the Project intends to include air quality Project Design Features ("PDFs"). Specifically, the DEIR states:

> "The following Project Design Features (PDFs) have been incorporated into the Project and the impact analysis in Section 4.2.6 below.
>
> **PDF-AQ-1** Offroad equipment used during construction shall meet CARB Tier 4 Final emission standards or better.
>
> **PDF-AQ-2 Construction Budget.** To ensure construction activities occur within the assumptions utilized in the Air Quality Impact Analysis (AQIA) (Appendix C-1) and disclosed in the EIR, the following shall be implemented:
>
> - During each Phase of Project construction, the operating hours of construction equipment on site shall not exceed the assumptions set forth in Table 5-2 of the AQIA. In the event alternate equipment is required, the applicant shall provide documentation demonstrating equivalent or reduced emissions based on horsepower and hours of operation. The construction contractor shall submit a construction equipment hours log to the March JPA every 2 weeks to ensure compliance.
>
> - During Phase 1, areas of active ground disturbance shall not exceed a maximum of 20 acres per day for Mass Grading and 20 acres per day for Blasting & Rock Handling. During Phase 2, the area of active ground disturbance shall not exceed a maximum of 20 acres per day for Remedial Grading. The construction contractor shall submit a grading log to the March JPA every two weeks documenting acreage graded or equivalent cubic yardage to ensure compliance. "Active disturbance" does not include moving of equipment from staging area(s) to grading areas.

O-3.26

PDF-AQ-3 Future Site Plans. All Specific Plan Area site plans shall include documentation confirming the site plan's environmental impacts do not exceed the impacts identified and disclosed in this EIR. Absent such documentation, additional environmental review shall be required.

PDF-AQ-4 No Natural Gas Use. Specific Plan Area development shall not utilize natural gas. In the event a future structure requires access to any available natural gas infrastructure, additional environmental review shall be required" (p. 4.2-15).

However, the Project's air quality analysis is inadequate, as the DEIR should have incorporated the above-mentioned PDFs as formal mitigation measures. According to the Association of Environmental Professionals ("AEP") *CEQA Portal Topic Paper* on mitigation measures:

> "While not "mitigation", a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact."[1]

As demonstrated above, PDFs that are not formally included as mitigation measures may be eliminated from the Project's design altogether. Thus, as the PDFs described in the DEIR are not formally included as mitigation measures, we cannot guarantee that they would be implemented, monitored, and enforced on the Project site. This poses a problem, as the DEIR's air modeling includes the application of PDF-AQ-1, Tier 4 Final off-road equipment (p. 4.2-27). As such, until the DEIR guarantees the use of Tier 4 Final off-road equipment in a formal mitigation measure, the DEIR's air modeling overestimates the reduction to the Project's construction emissions and should not be relied upon to determine Project significance. A revised EIR should be prepared to adequately implement the above-mentioned PDFs as formal mitigation measures.

0-3.26 Cont.

Diesel Particulate Matter Emissions Inadequately Evaluated

The DEIR concludes that the proposed Project would result in a less-than-significant health risk impact based on a quantified construction and mobile-source operational health risk assessment ("HRA"), which is detailed in Health Risk Assessment Technical Report ("HRA Report") as Appendix C-2 to the DEIR. Specifically, the HRA Report estimates that the maximum cancer risk posed to nearby, existing residential sensitive receptors associated with Project construction and operation would be 1.03 in one million, which would not exceed the SCAQMD significance threshold of 10 in one million (see excerpt below) (p. 5, Table ES-3).

0-3.27

[1] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at:* https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.

TABLE ES-3: SUMMARY OF CONSTRUCTION AND OPERATIONAL CANCER AND NON-CANCER RISKS

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor	1.03	10	NO
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold**
Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1.0	NO

However, the DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for three reasons.

First, the DEIR's construction HRA incorrectly assumes the application of PDF-AQ-1 and PDF-AQ-2. Specifically, the DEIR states:

> "The health risk assessment included application of PDF-AQ-1, Tier 4 Final off-road equipment. Additionally, as required by PDF-AQ-2, throughout construction the applicant will demonstrate compliance with all construction equipment assumptions included in Appendix C-1 of this EIR" (p. 4.2-32).

0-3.27 Cont.

However, the incorporation of PDFs is unsubstantiated. As previously discussed, AEP guidance indicates that PDFs which are not formally included as mitigation measures may be eliminated from the Project's design altogether.[2] As the use of Tier 4 Final off-road equipment and compliance with all construction equipment assumptions are not incorporated as formal mitigation measures, we cannot guarantee that they would be implemented, monitored, and enforced on the Project site. Thus, the DEIR's construction HRA relies on an underestimated DPM concentration, and the resulting cancer risk should not be relied upon to determine Project significance.

Second, the DEIR's operational HRA underestimates the Fraction of Time At Home ("FAH") values. Specifically, the HRA utilizes a FAH value of 0.85 for the third trimester (age -0.25 to 0) and infant (age 0 to 2) receptors, and an FAH value of 0.72 for the child receptors (age 2 to 16) (see excerpts below) (Appendix C-2, p. 22, Table 2-7).

0-3.28

[2] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at:* https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.

TABLE 2-7: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (30 YEAR RESIDENTIAL)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days/year)	Exposure Time (hours/day)
-0.25 to 0	361	10	0.25	0.85	350	24
0 to 2	1,090	10	2	0.85	350	24
2 to 16	572	3	14	0.72	350	24
16 to 30	261	1	14	0.73	350	24

However, the FAH values used for the third trimester, infant, and childhood receptors are incorrect, as SCAQMD guidance clearly states:

> "For Tiers 1, 2, and 3 screening purposes, the FAH is assumed to be 1 for ages third trimester to 16. As a default, children are assumed to attend a daycare or school in close proximity to their home and no discount should be taken for time spent outside of the area affected by the facility's emissions. People older than age 16 are assumed to spend only 73 percent of their time at home."[3]

Per SCAQMD guidance, the HRA Report should have used an FAH of 1 for the third trimester, infant, and child receptors. By relying on incorrect FAH values, the DEIR underestimates the cancer risk posed to nearby, existing sensitive receptors as a result of Project operation.

O-3.28 Cont.

Third, further review of the HRA Report demonstrates that the HRAs may fail to include Age Sensitivity Factors ("ASFs"). Regarding ASFs, OEHHA guidance states:

> "Studies have shown that young animals are more sensitive than adult animals to exposure to many carcinogens (OEHHA, 2009). Therefore, OEHHA developed age sensitivity factors (ASFs) to take into account the increased sensitivity to carcinogens during early-in-life exposure (Table 8.3). These factors were developed and described in detail in OEHHA (2009). In the absence of chemical-specific data, OEHHA recommends a default ASF of 10 for the third trimester to age 2 years, and an ASF of 3 for ages 2 through 15 years to account for potential increased sensitivity to carcinogens during childhood."

However, while the HRA Report includes ASFs in their exposure assumption tables, the equation to produce carcinogenic risk estimates, as shown below, is incorrect and underestimated (p. 23-24).

O-3.29

[3] "Risk Assessment Procedures." SCAQMD, August 2017, available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.

RISKair = DOSEair x CPF x ED/AT

Where:

DOSEair	=	chronic daily intake (mg/kg/day)
CPF	=	cancer potency factor
ED	=	number of years within particular age group
AT	=	averaging time

0-3.29 Cont.

Instead, the HRA Report should have used the following equation that includes ASFs:

$$Cancer\ Risk_{AIR} = Dose_{AIR} \times CPF \times ASF \times FAH \times \frac{ED}{AT}$$

By potentially failing to include ASF values in the carcinogenic risk estimate equation, the DEIR's HRA underestimates the cancer risk posed to nearby, existing sensitive receptors as a result of Project construction and operation. As such, a revised EIR should be prepared to include an updated analysis correctly accounting for ASF values.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

As previously discussed, the DEIR concludes that Project operation would result in significant-and-unavoidable air quality impacts. However, we have identified several additional mitigation measures that should be incorporated to reduce the Project's significant air quality impacts. Feasible mitigation measures can be found in the California Department of Justice Warehouse Project Best Practices document.[4] Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

0-3.30

- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.

[4] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.

- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.
- Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.
- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.

O-3.30 Cont.

- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.

O-3.30 Cont.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project operation.

Furthermore, as it is policy of the State that eligible renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045, we emphasize the applicability of incorporating solar power system into the Project design. Until the feasibility of incorporating on-site renewable energy production is considered, the Project should not be approved.

A revised EIR should be prepared to include all feasible mitigation measures, as well as include an updated air quality analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing

O-3.31

results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

O-3.31 Cont.

Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

Attachment A: Matt Hagemann CV
Attachment B: Paul Rosenfeld CV

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
(949) 887-9013
mhagemann@swape.com

Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

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Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

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Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

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Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

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Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

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Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

Letter O-3

Blum Collins & Ho
March 3, 2023

O-3.1 This comment is introductory in nature. Specific comments regarding the Draft EIR are provided and responded to below. In response to this comment, the commenter has been added to the EIR mailing list.

O-3.2 This comment summarizes the proposed Project and directly quotes the Draft EIR. The comment does not pose any questions or raise issues about the environmental analysis or the Draft EIR. Specific comments regarding the Draft EIR are provided and responded to below.

O-3.3 This comment alleges the Project Specific Plan was not available for public review. The proposed West Campus Upper Plateau Specific Plan was made, and remains, available for public review in the same location online as the Draft EIR https://marchjpa.com/mjpa-meridian-west-campus/. As explained in Recirculated Chapter 3, Project Description, and as noted by the commenter in Comment O-3.2, the Project's requested approvals and entitlements include proposed Specific Plan 21-01 (SP-9) that would address land uses, zoning, and design guidelines for approximately 370 acres of the Project site. The analysis in the Draft EIR addresses the proposed buildout of the Specific Plan Area pursuant to the proposed Specific Plan as well as the placement of a Conservation Easement over approximately 445 acres of the Project site. Section 3.5, Proposed Project, of Recirculated Chapter 3, Project Description, summarizes the proposed Specific Plan's land use designations and development standards, including the maximum heights, floor area ratios, and parking requirements, and as such, the Draft EIR adequately described the Project to provide a meaningful analysis of the proposed Project. As explained in Recirculated Section 4.10, Land Use and Planning, the proposed Specific Plan would be adopted by ordinance pursuant to the procedures and requirements set forth in the California Government Code and the March JPA Development Code. As such, the proposed Specific Plan is currently a draft document referenced for the purposes of conducting environmental review of the proposed Project.

The comment states that the Draft EIR must be revised and recirculated to include the Beaumont Pointe Specific Plan. The Beaumont Pointe Specific Plan is unrelated to the Project site as it is located in the City of Beaumont, California, which is approximately 21.5 miles northeast of the Project site and March JPA Planning Area. To the extent the commenter intended to refer to the proposed West Campus Upper Plateau Specific Plan, as discussed in Response O-3.3, above, the proposed Specific Plan is described and summarized for informational purposes and as relevant to the analysis in applicable sections of the Draft EIR and was made available for public review with the Draft EIR. The comment cites Public Resources Code Section 21003(b), which states the legislative intent that "[d]ocuments prepared pursuant to this division be organized and written in a manner that will be meaningful and useful to decisionmakers and to the public." The comment also refers to Section 15121 of the CEQA Guidelines, which describes an EIR's purpose as an informational document. According to Section 15121 of the CEQA Guidelines, "[t]he public agency shall consider the information in the EIR along with other information which may be presented to the agency." Neither of the provisions cited by the comment require the proposed draft Specific Plan to be attached to the Draft EIR. The comment also cites CEQA Guidelines Section 15150(f), which provides that "[i]ncorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand." The comment suggests that the

proposed Specific Plan should be attached to the Draft EIR because it contributes directly to the analysis of the Project. However, as discussed above and consistent with the requirements of CEQA, the proposed Specific Plan is described and summarized for informational purposes and as relevant to the analysis in applicable sections of the Draft EIR and was made available for public review concurrent with the Draft EIR.

O-3.4 This comment refers to attachments from SWAPE, which are provided and responded to below. Please see Responses O-3.23 through O-3.31, below.

O-3.5 This comment alleges the Draft EIR does not include environmental justice analysis. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8, and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

O-3.6 The comment provides information from CalEnviroScreen, including rankings for the census tract that includes the Project site. CalEPA's Office of Environmental Health Hazard Assessment (OEHHA) developed the California Communities Environmental Health Screening Tool (CalEnviroScreen), which provides statewide data that can be used to identify communities disproportionately burdened by multiple sources of pollution.[2] The CalEnviroScreen model includes two components representing pollution burden (exposures and environmental effects) and two components representing population characteristics (sensitive populations and socioeconomic factors).[3] An overall pollution burden score is calculated by CalEnviroScreen based on indicators related to exposures (i.e., ozone concentrations, $PM_{2.5}$ concentrations, diesel particulate matter emissions, drinking water contaminants, etc.) and environmental effects (e.g., cleanup sites, groundwater threats, hazardous waste, etc.). As noted in the comment, the census tract that includes the Project site has a high overall pollution burden score. The comment also refers to several of these individual indicator scores from CalEnviroScreen for the census tract that includes the Project site and describes some of the potential health effects associated with various forms of pollution and population characteristics.

[2] https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[3] https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf

The Project's census tract is large and includes all of the March ARB and the March JPA jurisdiction along with three blocks within the City of Moreno Valley, which appear to have been mapped as part of March JPA. The residential uses within the March ARB census tract are located approximately two miles from the Project site; the residents in the retirement community are to the south of Van Buren Boulevard and the residents in Moreno Valley are to the east on the opposite side of the 215 Freeway and north of Alessandro Boulevard. As shown in Figure 4.2-2, of Recirculated Section 4.2, Air Quality, these residents are all outside of the cumulative impact area from the Project's truck routes. As such, the proposed Project is not proximate to these residences.

Moreover, the comment addresses the residences immediately adjacent to the north, south, and west of the Project site, which are in different census tracts that are not identified in CalEnviroScreen as burdened with pollution and the data the comment cites does not apply to these residences. For example, the Orangecrest neighborhood to the south of the Project site is located within two different census tracts, census tracts 6065042013 and 6065042014, with low rates of pollution burden and poverty and high rates of educational attainment. The same is true for the Mission Grove neighborhood, also cited by commenter, which is located to the northwest and west of the Project site within census tract 6065042012. That census tract also includes the residences located in Riverside County to the north of the Project site. As such, the residential areas located near the Project site identified by the comment are not in poor communities overburdened with pollution as identified by CalEnviroScreen and the data cited in the comment is not applicable to these residences. The residential areas that are within the census tract that is cited in the comment are far from the Project site and will not be directly impacted by the development of the Project.

The information provided regarding the CalEnviroScreen rankings does not change the significance conclusions in the Draft EIR.

O-3.7 The comment states that the census tract that includes the Project site is identified as a SB 535 disadvantaged community, along with census tracts to the north and south. The census tracts referenced in the comment as SB 535 disadvantaged communities "adjacent" to the Project site are not actually adjacent to the Project site. As noted above in Response O.3-6, the Project census tract is large and includes all of the March ARB and March JPA jurisdiction. Census tract 6065042010 is located to the south of the Project census tract and is south of the Riverside National Cemetery and the golf course. Census tract 6065042505 is located to the north of the Project census tract, on the opposite side of I-215 and north of March ARB. The census tracts adjacent to the Project site (6065042012, 6065042014, and 6065042013), which include the Mission Grove neighborhood, the residences located in Riverside County to the north of the Project site, and the Orangecrest neighborhood south of the Project site, are not identified as SB 535 disadvantaged communities.[4]

O-3.8 The comment states that California's Building Energy Code Compliance Software (CBECC) is the appropriate software to be used in the energy analysis rather than CalEEMod.

As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4), the commenter is correct that the CBECC model is the approved compliance method specifically for Title 24 compliance, which would be required for any development project at the time of physical building construction (approximately 12-18 months after entitlement). The CBECC model is used to confirm final

[4] https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/

design, with detailed information included in construction drawings, is Title 24 compliant. The final design and construction drawings for the Project are not, nor do they need to be in order to conduct environmental review, available at this time and are not typically prepared until after the Project is approved/entitled. CBECC will be used by the design team to ensure the Project buildings comply with Title 24 prior to construction.

The EIR and underlying technical studies correctly utilized CalEEMod, which estimates energy demand based on average intensity factors for similar land use types based on the site plans provided to March JPA for entitlement. Since the Project's tenants are unknown at this time, and information about the future tenants' energy use is not available at this time, it is appropriate to use the CalEEMod default assumptions which have been derived by the California Air Pollution Control Officers Association (CAPCOA) based on survey data. Additionally, CalEEMod is based on the previous 2019 version of Title 24 and does not account for the latest 2022 Title 24 requirements that became effective on January 1, 2023. The modeling also does not take into account MM-AQ-6, which requires that all buildings constructed to achieve the 2023 LEED Silver certification standards or equivalent, at a minimum.

The MMRP and the requirement to obtain building permits will require compliance with the most current version of Title 24 at the time of approval, including CBECC modeling to show compliance. Therefore, revisions to the Draft EIR are not required.

O-3.9 This comment alleges the Draft EIR's consistency analysis with the Connect SoCal is misleading. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), the consistency analysis in the Draft EIR is accurate. Goal 5 of Connect SoCal is to reduce greenhouse gas emissions and improve air quality. To meet that goal, "Connect SoCal includes a sustainable communities strategy which sets forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, if implemented, will reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by ARB for the SCAG region." The forecasted development pattern is based on a regional growth forecast that was developed by working with local jurisdictions using the most recent land use plans and policies and planning assumptions.[5]

SCAG explicitly found that "For the purpose of determining consistency with Connect SoCal for California Environmental Quality Act (CEQA), grants or other opportunities, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency."[6] March JPA determines consistency with Connect SoCal based on consistency with the long-term employment and growth projections. The SCS also indicates that this is a jobs poor area so providing more jobs will actually reduce GHG emissions and reduce VMT as it will provide local jobs to achieve a more favorable jobs-housing balance. (Appendix C-4 of the Final EIR)

Goal 6 of Connect SoCal relates to healthy and equitable communities. Please see Recirculated Section 4.10, Land Use and Planning, for analysis of the Project's consistency with March JPA's adopted Environmental Justice Element. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8, and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar

[5] https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020
[6] Connect SoCal p. xiv

to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies. As discussed above, in Responses O.3-5 and O.3-7, the purpose of the Draft EIR is to evaluate and disclose the potential environmental consequences of the proposed Project. Consistent with the requirements of CEQA and Goal 6, the Draft EIR analyzes the proposed Project's potential environmental impacts, including impacts related to public health and the community. (Appendix C-4 of the Final EIR)

The proposed Project would increase regional employment by approximately 3,622 jobs. According to SCAG's 2020-2045 RTP/SCS, employment within Riverside County in 2019 is approximately 812,800 jobs with an anticipated increase to approximately 1,102,700 jobs by 2045, a growth of approximately 289,900 jobs. The proposed Project contributes 1.24% of the anticipated increase in jobs, and therefore, it is consistent with the job growth and would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or the AQMP or result in employment growth that would substantially add to traffic congestion. Additionally, the Project would comply with the policies set forth in the 2020-2045 RTP/SCS by reducing vehicle trips and VMT, increasing the use of alternative fuel vehicles, and improving energy efficiency. (Appendix C-4 of the Final EIR)

The proposed Project is consistent with the long-term employment and growth projections used by SCAG in the RTP/SCS and is therefore consistent with Connect SoCal. Moreover, the Project does not impede implementation of improvements to the transportation network, and other transportation measures and policies. Therefore, the Project will not impede SCAG's efforts to "reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by ARB for the SCAG region." (Appendix C-4 of the Final EIR)

The comment is correct that Project would exceed regional significance thresholds for emissions of VOC, NOx, CO, and PM_{10} (also $PM_{2.5}$ as disclosed in Recirculated Section 4.2, Air Quality). However, this is not a factor in determining consistency with the RTP/SCS. In fact, the Connect SoCal EIR and subsequent addenda all found that implementation of the plan would result in significant and unavoidable air quality impacts:

> *"While the SCAG region may see an increase in PM2.5, PM10 and SOx emissions, the SCAQMD, AVAPCD, ICAPCD, and MDAQMD have not established regional thresholds to determine significance. The air districts within the SCAG region have only established project-level thresholds (see Table 3.3-9, Table 3.3-10, and Table 3.3-11). Therefore, individual projects must compare anticipated project emissions to the thresholds for the air district within which they are located in order to determine significance on the project-level. Because mobile source emissions of PM10 and PM2.5 will increase (PM10 would increase in Imperial, Orange, Riverside, and San Bernardino Counties and PM2.5 would increase in Imperial, Riverside, and San Bernardino Counties), largely as a result of increased total VMT, and SOx would increase in the region at least through 2031, the Plan could contribute to an air quality violation. Further, there is the potential for individual projects to exceed local*

standards during construction and/or operation for several pollutants. Therefore, this impact is considered to be significant."[7]

The Connect SoCal EIR included Mitigation Measure PMM-AQ-1 that suggests mitigation measures that local agencies should consider when approving development projects to reduce substantial adverse effects related to violating air quality standards. As explained in the table below, the Project is consistent with, and incorporates all of, the applicable suggested mitigation measures in Connect SoCal regarding air quality. (Appendix C-4 of the Final EIR)

Connect SoCal EIR PMM-AQ-1 – In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:	
a) Minimize land disturbance.	**Consistent. MM-AQ-2** limits amount of daily grading as follows: During Phase 1, areas of active ground disturbance shall not exceed a maximum of 20 acres per day for Mass Grading and 20 acres per day for Blasting & Rock Handling. During Phase 2, the area of active ground disturbance shall not exceed a maximum of 20 acres per day for Remedial Grading. The construction contractor shall submit a grading log to March JPA every two weeks documenting acreage graded or equivalent cubic yardage to ensure compliance.
b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires implementation of Table 3 contingency measures when wind gusts exceed 25 miles per hour.
c) Cover trucks when hauling dirt.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires coverage of haul vehicles.
d) Stabilize the surface of dirt piles if not removed immediately.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires stabilization of open storage piles.
e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires watering of, or application of a chemical stabilizer to, unpaved roads.
f) Minimize unnecessary vehicular and machinery activities.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires establishing stabilized haul routes, limiting vehicular travel to those routes, and preventing motor vehicle and/or off-road vehicle trespassing, parking and/or access by installing barriers, curbs, fences, gates, posts, signs, shrubs, trees or other effective control measures.
g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires all track-out from an active operation be removed at the conclusion of each workday or evening shift.
h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires stabilization of soils, materials, and slopes through hydroseeding and soil binders until vegetation or ground cover growth.

[7] ConnectSoCal PEIR, pg. 3.3-61

i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.	**Not Applicable.**
j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.	**Consistent. MM-AQ-2** requires the construction contractor to submit biweekly construction equipment hours log to March JPA. In the event alternate equipment is required, the applicant shall provide documentation demonstrating equivalent or reduced emissions based on horsepower and hours of operation.
k) Ensure that all construction equipment is properly tuned and maintained.	**Consistent. MM-AQ-3** requires all construction equipment to be tuned and maintained in accordance with the manufacturer's specifications, with maintenance records onsite and available to regulatory authorities upon request.
L) Minimize idling time to 5 minutes—saves fuel and reduces emissions.	**Consistent. MM-AQ-3** prohibits construction equipment idling longer than 3 minutes.
m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.	**Consistent.** As explained in Section 4.9, Hydrology and Water Quality, grading and construction of the Project would include spraying with water trucks for soil compaction and dust suppression.
n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.	**Consistent. MM-AQ-3** requires the designation of an area where electric-powered construction vehicles and equipment can be charged. **MM-AQ-3** further prohibits the use of diesel-powered portable generators, unless necessary due to emergency situations or constrained supply.
o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.	**Consistent. MM-TRA-1** requires the development and implementation of a Construction Traffic Management Plan to address potential construction-related traffic detours and disruptions to ensure that to the extent practical, construction traffic would access the Project site during off-peak hours.
p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.	**Not Applicable.** This is a voluntary program for owners or operators of portable engines and other types of equipment can register their units under the CARB Statewide Portable Equipment Registration Program (PERP) in order to operate their equipment throughout California without having to obtain individual permits from local air districts. https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp
q) Require projects within 500 feet of residences, hospitals, or schools to use Tier 4 equipment for	**Consistent. MM-AQ-1** requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission

all engines above 50 horsepower (hp) unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds.	standards or better. **MM-AQ-3** requires the construction contractor to use heavy-duty hauling trucks that are model year 2014 or later and to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible.

While the Project will implement all of the applicable Connect SoCal mitigation measures and additional mitigation measures to reduce impacts to air quality, March JPA has determined, as reflected in the EIR, that it would not be feasible to reduce emissions to less than significant levels. Further reduction of emissions must come from car and trucks emissions, which are regulated by the EPA (Federal), CARB (State) and South Coast Air Quality Management District (Regional) and are outside March JPA's local jurisdiction and control. (Appendix C-4 of the Final EIR)

Additionally, the modeling conservatively does not account for emission reductions achieved by the use of zero emission vehicles, and as electric vehicles and electric trucks comprise larger portions of the vehicle fleet, emissions of the Project would be overrepresented. Similarly, while construction and operation of the proposed Project would generate GHG emissions, the Project will not interfere with or obstruct any GHG reduction plans and will implement several mitigation measures and design features that would reduce overall GHG emissions. (Appendix C-4 of the Final EIR)

The comment alleges inconsistency with Goal 7 of Connect SoCal without any explanation. The full text of Goal 7 is to "Adapt to a changing climate and support an integrated regional development pattern and transportation network." Connect SoCal defines Climate Change Adaptation as "The Process of adjusting to actual or expected climate change and its effects, in order to moderate or avoid harm. Adaptation addresses the impacts but not the causes of climate change." The Project supports an integrated regional development pattern that was accounted for in development of Connect SoCal. The Project itself will not impede SCAG's efforts to adapt to a changing climate, and includes the following project design features and mitigation measures to further reduce GHG emissions:

- PDF-AQ-1 prohibits the use of natural gas by Specific Plan Area development.
- MM-AQ-1 requires all offroad construction equipment to meet CARB Tier 4 Final emissions standards or better.
- MM-AQ-3 requires the construction contractor to use heavy-duty hauling trucks that are model year 2014 or later and electric-powered hand tools, forklifts and pressure washers, to the extent feasible and further requires the designation of an area where electric-powered construction vehicles and equipment can charge. MM-AQ-3 prohibits construction equipment idling for more than three minutes and the use of diesel-powered generators.
- MM-AQ-6 requires all buildings achieve the 2023 LEED Silver certification standards or equivalent, at a minimum.
- MM-AQ-7 requires that each Project building is designed for passive heating and cooling and is designed to include natural light.
- MM-AQ-8 requires all TRU loading docks provide electrical hookups and all loading docks are designed to be compatible with SmartWay trucks.
- MM-AQ-11 requires main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available.
- MM-AQ-13 requires electrical service or charging stations be provided in convenient locations for electric and battery-powered landscape maintenance equipment.

- MM-AQ-14 requires tenants utilize electric or battery-operated equipment for landscape maintenance.
- MM-AQ-17 requires truck drivers to shut off engines when not in use and three-minute truck idling limits.
- MM-AQ-18 requires use of only electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided.
- MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments on the Recirculated EIR MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed.
- MM-AQ-22 requires tenants provide information to employees and truck drivers on: Building energy efficiency, solid waste reduction, recycling, and water conservation; Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting; Participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies; Health effects of diesel particulates, state regulations limiting truck idling time, and the benefits of minimized idling; The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity; Efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- MM-AQ-24 prohibits the use of diesel back-up generators, unless absolutely necessary. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the Project site for only the minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.
- MM-AQ-25 requires the facility operator monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable, by maintaining records on-site demonstrating compliance and making records available for inspection by the local jurisdiction, air district, and state upon request.
- PDF-GHG-1 requires conduit to be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available.
- MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
- MM-GHG-2 through MM-GHG-6 require additional building design features to reduce GHG emissions.

- MM-GHG-7 requires each Project site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code.
- MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables.

0-3-10 This comment identifies elements of the Bird/Wildlife Aircraft Strike Hazard (BASH) study not incorporated into the Project Specific Plan. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, and as noted in the comment, the Project site is located within the C1 Primary Approach/Departure Zone and C2 Compatibility Zone pursuant to the Land Use Compatibility Plan for the March Air Reserve Base/Inland Port Airport. The March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP) was adopted by the Riverside County Airport Land Use Commission (ALUC) in 2014 and provides noise and safety policies governing development of compatible future land uses in areas within the airport influence area. As noted in the comment and explained in the Draft EIR, the Riverside County ALUC held a public hearing on the Project on May 12, 2022, and found the Project to be conditionally consistent with the ALUCP. One of the ALUC's conditions is that the future BASH study, as prepared by a qualified wildlife hazard biologist, come back to the ALUC for review in the event it raises significant issues. As the comment notes, the BASH study for the Project, dated June 28, 2022, was attached to the Draft EIR as Appendix J-4. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, pursuant to the BASH study, PDF-HAZ-1 through PDF-HAZ-4 are incorporated into the proposed Specific Plan to be consistent with Federal Aviation Administration guidance, the 2018 Air Installation Compatible Use Zone for March ARB (AICUZ), and the Riverside County ALUCP with regard to wildlife attractants and hazards to flight operations. As explained in the BASH study appended to the Draft EIR, the incorporation of the recommended modifications included in the BASH study would make the Specific Plan consistent with these policies and plans. The proposed Specific Plan has been updated to incorporate all of the recommended modifications identified in the BASH study, including the items identified in the comment, and, as such, will be consistent with the adopted ALUCP in accordance with the ALUC's conditions. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. With these modifications to the Specific Plan, the BASH study did not identify any significant issues requiring additional ALUC review. No mitigation measures are required.

0-3.11 This comment states that the EIR does <u>not</u> provide an erroneous and misleading consistency analysis with land use plans but also states that the EIR is incorrect in concluding that the Project is consistent or partially consistent with two goals from the Noise/Air Quality Element of the March JPA General Plan to reduce air pollution (Goals 3 and 8) because the Project would result in significant and unavoidable impacts related to air quality. However, Recirculated Section 4.10, Land Use and Planning, acknowledges the significant and unavoidable impacts related to certain emissions, and explains that the Project would be partially consistent with Goal 3 (Reduce air pollution through proper land use, transportation, and energy use planning) because it would also provide employment opportunities to western Riverside County, maintaining the County's balanced jobs-to-housing ratio, and reducing commutes and VMT, which would reduce air emissions. Thus, although the Project would exceed some specific emission thresholds, it would also reduce air pollution through proper land use, transportation, and energy use planning. With regard to Goal 8 (Reduce air pollution emissions and impacts through siting and building design), as explained in Recirculated Section 4.10, Land Use and Planning, the

Project would be consistent with this goal, as Project development would include separation of sensitive receptors from pollutant emissions. MM-AQ-4 requires the use of "Super-Compliant" low VOC paint. MM-AQ-6 requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent. MM-AQ-7 requires all buildings to be designed for passive heating and cooling with the inclusion of natural light. MM-AQ-8 requires all TRU loading docks provide electrical hookups and all loading docks be designed to be compatible with SmartWay trucks. MM-AQ-9 requires industrial buildings larger than 400,000 SF to include a truck operator lounge, to reduce idling emissions. MM-AQ-11 requires installation of main electrical supply lines and panels that have been sized to support "clean fleet" charging facilities when these trucks and delivery vehicles become available. MM-AQ-13 requires electrical outlets or charging stations be provided near landscaped areas. MM-AQ-14 requires tenants utilize electric or battery-operated landscape maintenance equipment. The Project would also be consistent with the County of Riverside's Good Neighbor Policy, as outlined in Table 4.10-2 in Recirculated Section 4.10, Land Use and Planning. As such, although the Project would exceed specific emission thresholds, it would also reduce air pollution emissions and impacts through siting and building design.

O-3.12 This comment questions the likelihood of filling the Project's jobs with the Riverside County worker pool. As discussed in Topical Response 5 – Jobs, Project buildout would occur over an approximately 5-year horizon. The employment growth projections (i.e., forecasts) utilized within the Draft EIR are provided by each local jurisdiction (e.g., Riverside County, City of Riverside, City of Moreno Valley, City of Perris) to the Southern California Association of Governments (SCAG) and based on the anticipated growth in population in Riverside County during the near-term (projected increase of 360,000 new County residents by 2030) and long-term (projected increase of 759,000 new County residents by 2045). As such, additional jobs will be needed to continue to provide employment opportunities for future residents of Riverside County. Section 4.12, Population and Housing, of the Draft EIR cites SCAG data in which, "48.6% of residents within unincorporated Riverside County work and live in the County, while 51.4% commute outside of the County (SCAG 2019b)." SCAG identified similar trends for Riverside County as a whole (inclusive of the incorporated and unincorporated areas). Approximately 48.0% work and live in Riverside County, while 52.0% commute to other places (SCAG 2019a). Further, as discussed in the General Plan, March JPA was formed to create jobs within this portion of Riverside County as part of the March Air Reserve Base realignment. It is reasonable to assume the jobs generated by the Project could be filled with existing local residents residing within the County, either from the unemployed population or residents looking to reduce their commutes. Additionally, using CalEnviroScreen 4.0,[8] the census tracts in the area surrounding March JPA have an average unemployment of 9%, which is higher than the state or county rate, further supporting the Draft EIR's determination that the Project's jobs could be filled locally

O-3.13 This comment questions the Project's job generation. As discussed in Topical Response 5 – Jobs, the Draft EIR utilizes the Project jobs estimate of 2,595 employees used by Western Municipal Water District (WMWD) in its Water Supply Assessment (Appendix O) for the Project. A March JPA economic impact ratio of 1,486 square feet per job was derived utilizing 2023 March JPA economic impact data, which includes on-site jobs and ancillary jobs such as truck drivers. The Project would generate ancillary jobs for truck drivers and Table 4-2 of the West Campus Upper Plateau Traffic Analysis (Appendix N-2) indicates the Project would generate 2,054 truck trips (which is 1,027 trucks coming and going to the

[8] Produced by the California Office of Environmental Health Hazard Assessment and analyzes various pollution burden data with population characteristics and assigns a score to each census tract relative to other census tracts.

site) which equates to approximately 1,027 truck drivers. When the Project's estimated truck drivers (1,027) are added to the Project's estimated on-site employees (2,595), the Project has an estimate of 3,622 total jobs generated. The Project's combined jobs estimate of 3,622 conservatively exceeds the March JPA employment ratio estimate (of 3,357) by only 8%, or 265 jobs. The comment proffers SCAG's Employment Density Study (2001), however, March JPA is afforded deference in its "decision to use a particular methodology and reject another" and substantial evidence supports March JPA's decision to use data specific to its location rather than the generic area wide data cited in the comment. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 514; *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 337.

O-3.14 This comment requests a quantified construction employee analysis, including their geographic locations. As explained in Section 4.12, Population and Housing, construction activities at the Project site would lead to the temporary need for construction workers, which may come from surrounding communities or elsewhere within the SCAG region. As the Draft EIR explains, the proposed Project involves construction requirements that would not require a highly specialized labor force to permanently relocate from other regions. Different construction activities would require specific skill sets for a shorter duration than the overall Project construction schedule; therefore, construction workers would not be needed continuously and only for varying portions of the Project phases. Therefore, as explained in the Draft EIR, it is reasonable to assume that workers/crews would work at the Project site on a temporary basis only, and thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Section 4.15, Transportation, analyzed VMT impacts from Project construction and determined any increase in VMT associated with Project construction jobs would be temporary and cease once construction is completed so impacts would be less than significant.

O-3.15 This comment questions the Draft EIR's analysis of cumulative employment generation. The cumulative effect of combined population and employment growth associated with the proposed Project and other planned projects in the vicinity is discussed in Section 4.12.7 within Section 4.12, Population and Housing, in the Draft EIR. As discussed therein, the anticipated population and employment growth associated with the cumulative projects, inclusive of the Veterans Industrial Park and the South Campus Specific Plan projects referenced in the comment, falls within the SCAG's projections for Riverside County. Consistent with SCAG growth projections for the region, the Draft EIR states, "The cumulative growth induced by the Project combined with other approved and proposed projects is unlikely to result in substantial employment growth beyond that which is already planned for in the County and region. In combination with the Project, impacts to population growth or housing availability would not be cumulatively considerable." Projects considered to be "in the pipeline" by the comment have been included in the analysis throughout the Draft EIR, including the analysis within Section 4.12, Population and Housing. As discussed in Response O-3.12, there is a need for more jobs in the area.

O-3.16 This comment questions the March JPA General Plan Housing Element compliance. The statement in the Draft EIR that "The State of California's HCD, in recognition of the unique governance and responsibilities of March JPA and the adequacy of housing sites within the member jurisdictions, has resolved that incorporation by reference of the four housing elements complies with the guidelines and requirements of a Housing Element" comes directly from the March JPA General Plan Section 4, Housing Element, which has been in place since its adoption in 1999, and cites communications with the State of California Department of Housing and Community Development in connection with the preparation of the 1999 March JPA General Plan. Thus, no letter from California's Housing and

Community Development Department is needed in order to validate the statement and no revisions to the Draft EIR are required in response to this comment.

O-3.17 This comment questions the Draft EIR's energy modeling for the Project. Please see Response O-3.8, above, regarding modeling for Title 24. The energy modeling for the Project is not erroneous. Section 4.5, Energy, of the Draft EIR and the Project Energy Analysis (Appendix F) analyzed the Project's energy impacts and are consistent with CEQA Guidelines Section 15126.4 and Appendix F of the CEQA Guidelines. March JPA used the correct threshold from Appendix G and CEQA Guidelines Section 15126.4: "Would the Project result in wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?" The Draft EIR includes details on energy usage from construction and operations, including: building energy (electricity and natural gas) use, water consumption, and transportation-related fuel consumption. The methodology is based on Guidelines Appendix F and is entirely consistent with CEQA and the CEQA Guidelines. Energy usage was quantified for purposes of analysis in the EIR using CalEEMod, which provides a high-level estimate of energy usage based on land use types, building size, and vehicle trips. As explained in Section 4.5, Energy, the Project would not consume an unusual or wasteful amount of energy or materials and would comply with California Building Energy Efficiency Standards (24 CCR Part 6). In addition, the Project would implement all feasible mitigation measures which would serve to reduce the Project's use of nonrecoverable materials and energy. As also explained in the Draft EIR, the utilities that service the Project and the design of the proposed Project are all subject to regulations that are working to reduce the amount of nonrenewable resources from development projects, and sustainability measures would reduce the use of materials and energy during construction and operation of the Project and will become more efficient and use less nonrenewable resources over time.

As explained in Section 5.4, Significant Irreversible Changes, of the EIR, pursuant to Section 15126.2(d) of the CEQA Guidelines, a significant irreversible change would occur if a project would involve a large commitment of nonrenewable resources; the primary and secondary impacts of the project would generally commit future generations of people to similar uses; the project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and/or the proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy). As the Draft EIR further explains, determining whether the proposed Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them.

This comment further questions the Draft EIR's analysis of the Project's operational energy consumption with regard to irreversible changes. In response to this comment, Section 5.4 of the Draft EIR is revised to remove potentially contradictory statements and acknowledge the additional mitigation measures being added to the Project. This revision does not change the analysis or significance conclusions in the Draft EIR.

As explained in Recirculated Section 4.2, Air Quality, the air quality project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation that will further reduce energy usage and will minimize the irreversible impacts to non-renewable resources.

O-3.18 This comment states that the Draft EIR does not discuss the Project's significant and unavoidable air quality impacts or the Project's required changes in land use designations. Recirculated Section 4.2, Air Quality, discloses that the Project would result in significant and unavoidable impacts for regional

operational emissions, even with mitigation. As discussed in Response O-3.17, above, the focus of the analysis of potential irreversible changes is primarily on the use of nonrenewable resources and energy sources, rather than emissions and land use designation changes. The Draft EIR appropriately analyzes and discloses that the Project would result in significant and unavoidable air quality impacts for regional operational emissions, even with the implementation of mitigation. Additionally, Recirculated Section 4.2, Air Quality, concludes that because the Project exceeds regional operational emission significance thresholds and would require a zoning change for portions of the Project site, the proposed Project has the potential to conflict with the Air Quality Management Plan, which is determined to be a significant and unavoidable impact. The Project's potential impacts in relation to climate change are addressed in Section 4.7, Greenhouse Gas Emissions.

O-3.19 This comment questions the EIR's analysis of growth-inducing impacts. As explained in Section 5.5, Growth-Inducing Impacts, of the EIR, Section 15126.2(e) of the CEQA Guidelines requires a discussion of how the potential growth-inducing impacts of a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. The growth-inducing impacts analysis in the Draft EIR refers to the detailed discussion in Recirculated Chapter 3, Project Description, which includes the Project's proposed land use designation changes in subsection 3.5.6, Requested Approvals and Entitlements. As explained in Recirculated Chapter 3, Project Description, the Project's requested entitlements include a General Plan Amendment, the proposed Specific Plan, and Zoning Designation. The Project site, including both the Specific Plan Area and Conservation Easement, has not previously been given a zoning designation; therefore, the Project proposes zoning consistent with the requested Specific Plan designations. As explained in Recirculated Chapter 3, Project Description, the Project proposes to amend the Project site's General Plan land use designations to: increase the area designated Parks, Recreation, and Open Space from approximately 122 gross acres to 523.43 gross acres; eliminate approximately 622.5 gross acres of Business Park designated property; eliminate approximately 63 gross acres of Industrial designated property; adopt the proposed Specific Plan on approximately 369.60 gross acres; and change the Business Park designation of approximately 2.87 acres to Public Facility to accommodate an existing water storage tank operated by EMWD.

The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. The analysis in the Draft EIR relies upon buildout conditions and assumes full buildout of the Specific Plan Area pursuant to the proposed General Plan Amendment and Zoning Designation described in Recirculated Chapter 3, Project Description.

O-3.20 This comment appears to be related to Section 5.5, Growth-Inducing Impacts, of the Draft EIR. As discussed in Response O-3.15, above, the analysis associated with cumulative growth in Riverside County is accounted for in the Draft EIR. A comprehensive list of cumulative projects is included within Table 4-2 of the Draft EIR. Including a list of all job-generating projects in Riverside County going back to 2016 as the comment requests is not necessary nor required to evaluate whether the proposed Project in combination with other planned, approved, or reasonably foreseeable projects would exceed the regional planning estimates utilized by SCAG. The jobs forecasts disclosed in Table 4.12-1 of the

Draft EIR are from Table 13 of SCAG's "Current Context: Demographics and Growth Forecast" technical report adopted on September 3, 2020.[9] The 280,000 jobs cited by the comment represents SCAG's projected increase in jobs in Riverside County between 2020 and 2045; during the same timeframe, SCAG projects the population in Riverside County to increase by 759,000. SCAG's technical report (Table 8) also shows that Riverside County's working age resident population (16-64) to employment ratio for 2045 is forecasted to be 1.72, the highest in the SCAG region and suggesting net out-commuting. According to SCAG projections, County of Riverside population increases will substantially outstrip employment generation. As explained in Section 5.5, Growth-Inducing Impacts, of the EIR, the planned growth of the Project and its land use intensity have been factored into the underlying growth projections of the SCAG 2020-RTP/SCS. Consistent with SCAG growth projections for the region, as employment opportunities grow within the service area so does population. The commitment of resources is addressed in Section 5.4, Significant Irreversible Changes, of the Draft EIR.

O-3.21 This comment questions the Draft EIR's selection of alternatives. As explained in Chapter 6, Alternatives, pursuant to Section 15126.6 of the CEQA Guidelines, an EIR is required to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. As set forth in the CEQA Guidelines, an EIR need not consider every conceivable alternative to a project. An EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation, and the alternatives discussion is required even if the alternatives would impede to some degree the attainment of the project objectives. A specific number of alternatives is not required as long as the alternatives evaluated represent a reasonable range. As described in Chapter 6, Alternatives, the intent of the alternatives analysis is to reduce the significant impacts of a project. Implementation of the proposed Project would not result in significant and unavoidable impacts related to VMT, as explained in Section 4.15, Transportation. Therefore, evaluation of alternatives to reduce VMT impacts is not required. Alternatives analyzed in Chapter 6, Alternatives, included alternatives that would reduce potential GHG and air quality impacts as compared to the proposed Project. Additionally, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

O-3.22 This comment refers to the commenter's prior comments. Responses to the commenter's specific comments on the Draft EIR are provided and responded to above. As explained in Responses O-3.1 through O-3.21 above, the Draft EIR adequately analyzed the proposed Project and evaluated and disclosed the potential environmental impacts associated with the proposed Project, consistent with the requirements of CEQA. The Draft EIR is comprehensive and none of the circumstances requiring recirculation of a draft EIR set forth in CEQA Guidelines Section 15088.5 have been met. Specifically, based on the comments and responses within this Final EIR, no new significant impacts or substantial increases in already identified significant impacts have been identified. As noted in Response O-3.1, above, the commenter has been added to the interested parties list as requested.

[9] https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

Responses to Attachment, SWAPE Analysis (March 3, 2022)

O-3.23 This comment describes the Project but incorrectly identifies its location. The Project is located within the March JPA Planning Area. The comment generally states the EIR's analysis of air quality and health risk impacts are inadequate. Specific comments are addressed below.

O-3.24 This comment summarizes the Project's regional operational emissions, and quotes the Draft EIR's conclusion that Project operational emissions would exceed SCAQMD regional significance thresholds for emissions of VOC, NO_X, CO, and PM_{10}. As discussed under Thresholds AQ-1 and AQ-2 of the Final EIR, the Specific Plan would exceed regional thresholds of significance established by the SCAQMD for VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$ emissions; thus, the Specific Plan's unmitigated impacts would be potentially significant. The Project will implement operational MM-AQ-5 through MM-AQ-27, which would reduce Project operational-source emissions. After accounting for MM-AQ-8, MM-AQ-14, MM-AQ-18 and MM-AQ-24, Project operational emissions would still exceed SCAQMD thresholds for emissions of VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$. The remaining operational mitigation measures would reduce Project operational-source emissions, the resulting emission reductions are not quantifiable in CalEEMod, and as such, reductions were not quantified and are therefore not reflected in the analysis.

O-3.25 Contrary to the comment's assertion, CEQA does not require that impacts are reduced to a less than significant impact. CEQA Guidelines §15126.2(c) (requiring an EIR to "Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.") The comment generally asserts additional feasible mitigation measures should be incorporated. As described in the Final EIR, the air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Specific comments on mitigation measures provided elsewhere in the comment letter as referenced in the comment are provided and responded to below. Finally, the comment references CEQA Guidelines Section 15096(g)(2), but this section applies to responsible agencies under CEQA. March JPA is the lead agency for this Project. The EIR complies with CEQA and includes all feasible mitigation measures to reduce the Project's significant and unavoidable air quality impacts.

O-3.26 This comment questions the use of air quality project design features. In response to comments, as part of the Recirculated Draft EIR, PDF-AQ-1 became MM-AQ-1, PDF-AQ-2 became MM-AQ-2, and PDF-AQ-3 became MM-AQ-5. The analysis in the Project AQIA and Project HRA was updated to evaluate the Project with and without these mitigation measures. Regarding PDF-AQ-1 (previously PDF-AQ-4), although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP, consistent with good practice identified by the Association of Environmental Professionals referenced in the comment. March JPA will monitor compliance through the MMRP. (Appendix C-4)

O-3.27 This comment recommends the EIR analysis evaluate emissions with and without PDF-AQ-1 and PDF-AQ-2. As discussed in Response O-3.26, above, these project design features were converted to mitigation measures and the Project HRA analyzed Project construction and operational DPM emissions for both without mitigation and with mitigation scenarios. As shown in Table ES-3 of the Project HRA, the unmitigated MEIR (R11) the maximum incremental cancer risk attributable to Project construction and operational-source DPM emissions is estimated at 4.05 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At

the mitigated MEIR (R12), the maximum incremental cancer risk attributable to Project construction and operational-source DPM emissions is estimated at 1.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

0-3.28 Contrary to the comment's statement that the HRA utilizes incorrect fraction of time at home ("FAH") values for the -0.25 to 0, 0 to 2, and 2 to 16 age bins, the analysis utilized fraction of time at home values consistent with OEHHA's Risk Assessment Guidelines.

Therefore, the HRA appropriately accounted for exposure to children. The analysis considers a conservative scenario in which a child is born at the start of Project construction and exposed to construction-related emissions and is then exposed to Project operational emissions for the remainder of the 30-year exposure duration. The analysis also analyzes a worst-case operational scenario in which a child is exposed to Project operational emissions from the third trimester through the first 30 years of life. These scenarios conservatively assume that emissions will remain static throughout the life of the Project and do not account for future emission reductions that would occur as more stringent emission standards and regulations are implemented.

It should be noted that SCAQMD's guidelines cited by the commenter apply specifically to HRAs performed under Rules 1401, 1401.1, and 212, which are applicable to permitting of stationary sources. The Project is not a stationary source and the guidelines cited in the comment are inapplicable here.

0-3.29 The comment states that the HRA may have failed to incorporate ASFs in the risk calculations. It should be noted that the formula presented on pages 23-24 of the analysis erroneously omitted ASFs and has been corrected in the Project HRA of the Final EIR. ASFs were correctly accounted for in the actual risk calculations, as shown in Appendix 2.4 of the Project HRA. As such, the resulting risk remains unchanged.

0-3.30 This comment recommends consideration of the mitigation measures suggested in the California Attorney General's guidance entitled "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" (September 2022). The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Please see Topical Response 2 – Air Quality, in the Final EIR, In response, please see Topical Response 2, Air Quality, for a discussion. for a detailed discussion of the Project's consistency with these mitigation measures. The comment further requests the feasibility of incorporating on-site renewable energy production. MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.

The EIR demonstrates a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible. Moreover, although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

O-3.31 This comment is conclusory in nature and does not raise any issues, questions or concerns about the analysis in the EIR.

Comment Letter O-4

RECEIVED

MAR 01 2023

BY: BB

Feb 21, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As a concerned resident of this great state, I am writing to submit comments on the draft Environmental Impact Report for the proposed West Campus Upper Plateau. As a former trainer for a state wide environmental consulting company, I am well aware of the importance of a thorough review of environmental impacts in order to comply with CEQA. In addition, I write as a resident of Sacramento County who is currently part of a community group attempting to dissuade our elected officials from approving distribution warehouses close to homes, parks and an elementary school. I also have studied the EIR completed for our area carefully.

O-4.1

The West Campus Upper Plateau (the "Project") would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

As someone who devotes a good deal of my time working with and for the community, I value giving residents a voice in decisions that directly affect them. In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. If it does not, please explain your rationale for ignoring these policies from your General Plan for this project.

O-4.2

As with many projects of this magnitude it conflicts with the interests of adjoining jurisdictions, specifically the adjacent residents. I have concerns that the development as proposed will do irreparable harm to surrounding commmunities in the following ways:

- Air quality impacts: The area described already has the worst air quality of any region of the United States. You have identified in your Draft Environmental Impact Report that there will be "significant and unavoidable" impacts to an area of the City and County that already bears an undue burden of pollution. Within a 5 km range of the proposed building site, there is already 45 million square feet of warehouses, generating over 30,000 truck trips, and spewing over 40 lbs of Diesel Particulate matter into the air daily. This does not include the other proposed warehouses in the immediate vicinity, including the one at the Sycamore Canyon site, that have already been approved to be built. Given the effects that Diesel PM accounts for 70% of cancers attributable to

O-4.3

toxic air contaminants, many local residents have expressed concerns for the health affects that this may have on them and their families.

O-4.3 Cont.

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

  1) Your DEIR does not account for the 215/60 corridor, even though the freeway is within a mile of the site; and ostensibly, this is the route the trucks will use. The 215 is already overburdened with truck traffic, and our local infrastructure is paying the cost to our roads. Please consult with CalTrans and include the 215/60 corridor in your traffic analysis for the final EIR to reflect the reality of how our local area will be impacted.

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

O-4.4

- Job creation claims: I understand that the Inland Empire has one of the lowest unemployment rates in the state and the nation. However, I have concerns about an overinvestment in industrial development for a number of reasons.

  According to the Southern California Association of Governments Economic Report (SCAG) for December 2022:

  "In 2001, GDP per capita in Riverside County and San Bernardino County were 64 percent and 69 percent of U.S. per capita GDP, respectively. When compared to the rest of California, the ratios are worse: 52 percent and 56 percent....Moreover, by 2022, **Riverside County's position had deteriorated to a per capita GDP of only 59 percent of the U.S. level and 40 percent of California**.... **These numbers are alarming, especially given the success of the Logistics Industry.** They imply that the impressive job growth in the Inland Empire since 2001 resulted in numerous jobs, but they tend to be relatively lower paying jobs compared to other parts of the state and nation. This explains, in part, why such a large number of workers prefer to commute into the coastal areas, despite the heavy cost involved in terms of time lost on the road. It also explains why the **Inland Empire's per capita GDP has sunk to a rank of 340 out of 386 MSAs,** despite being the twelfth largest by population count." (emphasis added)

  In other words, in spite of a low unemployment rate, your economic outlook is worse than it was prior to the explosion of the logistics industry. In that same SCAG report, they discuss how the logistics industry "will likely go through a transformation as advances in automation and artificial intelligence displace workers." It warns: "There will be further costs from the expansion of the Logistics Sector if the result of the expansion means that **there will be less industrial space**

O-4.5

available in the future for industries which are able to add more value to the economy per square foot." (emphasis added)

Furthermore, the vast majority of companies purchasing warehouses are not from the local area and are mostly from Orange County or outside California. 80% of the warehouses in Riverside County are owned by businesses with mailing addresses outside the region. For instance, more warehouse square footage in the Inland Empire is owned by businesses in Dallas, TX and Denver, CO than Riverside. So, we pay the costs of goods moving through Riverside County in terms of air quality and traffic, but the wealth from this industry is not benefitting our local economy.

O-4.5 Cont.

We need to think long and hard about land use if our goal is long-term economic growth. Considering the significant and unavoidable impacts and the minimal economic benefit created by the proposed development, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. Please encourage the developer to consider non-industrial, alternative uses of the land for the sake of those living adjacent to the site as well as the economic future of this region.

O-4.6

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,

Kate Carroll

Kate Carroll, Co-chair of Stone Creek Residents for Smart Growth

Katecarroll0108@gmail.com
916-549-4859

Letter O-4

Stone Creek Residents for Smart Growth
March 1, 2023

O-4.1 This comment is introductory in nature and does not raise comments on the adequacy of the environmental analysis in the EIR. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

O-4.2 This comment questions the Draft EIR's consistency determination with regard to March JPA General Plan Policies 2.3 and 2.4 given the Project's significant and unavoidable noise and air quality impacts. Please note that CEQA Guidelines Section 15125(d) requires EIRs to discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans. However, an inconsistency does not necessarily mean a potentially significant conflict under CEQA. Threshold LU-1 asks: Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? So, unless (1) the applicable plan, policy or regulation was "adopted for the purpose of avoiding or mitigating an environmental effect" and (2) the conflict would cause a significant environmental impact, any inconsistency would not be a potentially significant conflict under CEQA. Inconsistency with policies that do not avoid or mitigate an environmental effect would not be considered potentially significant under CEQA. General Plan Policies 2.3 (Support land uses that provide a balanced land use pattern of the Planning Area, and discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions) and 2.4 (Protect the interests of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses) do not avoid or mitigate an environmental effect so any inconsistency would not be considered potentially significant under CEQA. Further, as discussed in the Recirculated Section 4.10, Land Use and Planning, the Project is consistent with the Good Neighbor Guidelines for the County of Riverside. Topical Response 4 – Project Consistency includes a discussion of the Project's consistency with the City of Riverside Good Neighbor Guidelines. The purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses.

The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. The comment incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

With respect to noise impacts, as disclosed in Section 4.11, Noise, the Project would not generate substantial temporary or permanent increases in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Segment 13, which passes through industrial development and is a non-sensitive receiving land use, meaning that there are no nearby sensitive receptors, including residential uses. As such, this impact, while significant and unavoidable, would not impact any residential or other sensitive uses in the vicinity of the Project. All Project noise impacts to residential uses would be less than significant.

With regard to air quality impacts, the air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Please see Recirculated Section 4.2, Air Quality, for the revised air quality mitigation measures. Please see Topical Response 2 – Air Quality for a discussion of the Project's consistency with the following:

- Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act – Office of the California Attorney General, September 2022
- SCAQMD 2022 Air Quality Management Plan
- U.S. EPA – Mobile Source Pollution: Environmental Justice and Transportation
- World Logistics Center Settlement Agreement Air Quality Measures
- Centerpoint Properties Air Quality Conditions of Approval
- City of Fontana Ordinance 1891 Air Quality Measures

O-4.3 This comment states that the region has the worst air quality of any region of the United States, and that there are a large number of warehouses located within a 5 km range of the Project site. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR) and shown on Exhibit 2-A of the Revised Project Air Quality Impact Analysis (Appendix C-1), despite a significant increase in vehicle miles traveled, gross state product, and population, the cancer risk associated with diesel particulate matter emissions has decreased since 1990. In addition, SCAQMD has conducted an in-depth periodic analysis of TACs and their resulting health risks throughout the air basin. This study, the *Multiple Air Toxics Exposure Study in the South Coast Air Basin*, shows that cancer risk has decreased by approximately 83% between MATES II (1998) and MATES V (2018) at the nearest monitored location to the Project site. As the region and state continue to implement increasingly stringent emission controls and the electrification of truck fleets continues, it is anticipated that this trend would continue.

This comment questions why the Sycamore Canyon site and other proposed warehouses in the immediate vicinity of the Project site were not included in the analysis. Table 4-2 of the Draft EIR lists the cumulative projects included in the environmental analysis. The Sycamore Hills Distribution Center, north of the Project site and adjacent to Sycamore Canyon, is included.

The comment further raises concerns regarding health impacts due to DPM. Recirculated Section 4.2, Air Quality, and Appendix C-2 assess the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR) located 32 feet from construction activities,), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location,

non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts identified in the Draft EIR.

O-4.4 This comment states that the Draft EIR has deficiencies in the traffic analysis because the Draft EIR does not account for the 215/60 corridor and because truck drivers do not follow agreed upon routes. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), March JPA has adopted its own guidelines for traffic analysis: the March JPA Traffic Impact Study Guidelines, dated February 10, 2020 (March JPA Guidelines). Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. As such, to comply with CEQA, Caltrans does not utilize peak hour intersection operations analysis and instead utilizes VMT in compliance with SB 743 through its VMT-Focused Transportation Impact Study Guide (Caltrans VMT Guide), dated May 20, 2020. The March JPA Guidelines were adopted before the Caltrans VMT Guide and therefore the reference is now-superseded Caltrans guidance. The Project VMT Analysis (Appendix N-1) was prepared in compliance with the Caltrans VMT Guide and meets the current transportation analysis requirement for Caltrans. Caltrans was notified about the Project through the release of the Notice of Preparation on November 18, 2021. Caltrans also received the Notice of Availability for the Draft EIR when the document was circulated for public review beginning on January 9, 2023. No comments were provided by Caltrans during the scoping period or public review for the Project.

Pursuant to Caltrans safety requirements, the Project Traffic Analysis (Appendix N-2) included an assessment of the I-215 off-ramps at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard to ensure there is no queuing, or back-up, onto the freeway mainline. These I-215 off-ramps were selected because the Project is anticipated to contribute 50 or more peak hour trips to these off-ramp intersections, consistent with the March JPA Guidelines. The Project Traffic Analysis (Appendix N-2) performed a queuing analysis for these I-215 Freeway off-ramps for all scenarios (Existing [2021], Existing plus Project, Existing plus Ambient Growth plus Project, Opening Year [2028] Cumulative Without Project, Opening Year [2028] With Project, Horizon Year [2045] Without Project, and Horizon Year [2045] With Project). Based on the results of this queuing analysis, there are no study area off-ramps that are anticipated to experience queuing issues under any scenario. Caltrans is one of the state reviewing agencies for the Project, and had the opportunity to comment on the transportation analysis. https://ceqanet.opr.ca.gov/2021110304. Caltrans did not submit any comments on this Project.

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

The comment also raises concerns about enforcement and maintenance. In response to truck route enforcement concerns, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As has been the case with other areas in the Meridian Business Park, as the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they are also separate conditions of approval and also included in the MMRP. March JPA will monitor compliance through the MMRP. Regarding maintenance concerns, commercial trucks

pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[10]

O-4.5 This comment questions the number of jobs and unemployment rates in the Inland Empire region and questions the economic viability of additional logistics industry development. In response to questions about the employment numbers associated with the proposed Project, please see Topical Response 5-- Jobs. The comment also raises concerns regarding automation. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. The comment raises questions about outside companies purchasing warehouse space in Riverside County, which is not an environmental issue under CEQA.

O-4.6 This comment expresses general opposition to the proposed Project. The comment further requests a non-industrial alternative. In response to this comment, please see Topical Response 8-- Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

[10] https://www.dmv.ca.gov/portal/dmv-research-reports/department-of-motor-vehicles-dmv-performance-reports/where-did-your-2020-fees-go/

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Comment Letter O-5

From: George Hague <gbhague@gmail.com>
Sent: Thursday, March 9, 2023 11:35 AM
To: Dan Fairbanks
Cc: Cindy Camargo
Subject: ??? West Campus Upper Plateau (WCUP) warehouse Draft EIR + "World Logistics Center to break ground in Moreno Valley this year "– Press Enterprise

https://www.pressenterprise.com/2023/03/08/world-logistics-center-to-break-ground-in-moreno-valley-this-year/
World Logistic Center will build 26 warehouse with 6 million sq ft of warehousing each year until 2030 (March 8, 2023 P-E article)

Good morning Mr Fairbanks, March 9, 2023

Re: Sierra Club's additional comments on the West Campus Upper Plateau (WCUP) warehouse Draft EIR

When you try to justify the West Campus Upper Plateau (WCUP) warehouse project with "Overriding Considerations" you must not only include the four Moreno Valley Warehouse projects mentioned in the previous Sierra Club email, but also the following three warehouses that Moreno Valley is currently processing through planning: the Moreno Valley Trade Center, Heacock Commerce Center and the Edgemont Commerce Center. All of these Moreno Valley warehouses will provide many jobs and economic benefits to the immediate region in addition to the all their negative cumulative impacts.

The Press-Enterprise article found below reads that Moreno Valley's 40.2 million sq ft World Logistic Center (WLC) will break ground this year. The WLC will add 26 warehouses which they reports means adding 6 million sq ft of warehousing each year through 2030. Based on all the warehousing Moreno Valley has approved and processing the WCUP is not needed for local jobs. There is no economic justification for needing another warehouse like the WCUP when you factor in all the current and foreseeable warehouse building that will take place in the next seven years within all the cities as well as the county that are members of March JPA.

O-5.1

The fact that the WLC states they will be "carbon neutral" doesn't mean they will not be significantly polluting our non-attainment area with its almost 13,000 Daily Diesel Truck Trips as well as at least 50,000 Daily Trips from other vehicles impacting our already clogged freeways and local roads. It means they will probably need to buy credits elsewhere — probably in other countries.

O-5.2

The WCUP Final EIR must include all the Moreno Valley warehouses mentioned in both of Sierra Club's comment letters in all cumulative impacts as well as all other current and foreseeable projects from those agencies who are members of the March JPA or the document will be inadequate.

As mentioned in Sierra Club's previous comments on this project the Sierra Club strongly believes there are other very good uses for the land on which the WCUP is being proposed that doesn't impact the nearby residents and our region's non-attainment area.

O-5.3

Please keep me informed of all future documents, notices, meetings and notice of determination for this project.

Sincerely,

George Hague
Sierra Club
Moreno Valley Group

World Logistics Center to break ground in Moreno Valley this year

The 40.6-million-square-foot complex will be as big as 700 football fields

Monserrat SolisMarch 8, 2023 at 4:17 p.m.



An artist's rendering shows the planned World Logistics Center in eastern Moreno Valley. Now that lawsuits have been settled, the project is set to break ground later this year in eastern Moreno Valley. (Courtesy of Highland Fairview)

After more than a decade of debate and lawsuits that tried to stop it, a 40.6-million-square-foot warehouse project is set to break ground this year in Moreno Valley.

First proposed in 2012 and approved by the Moreno Valley City Council in 2015, the World Logistics Center — which would be one of the world's largest logistics centers — is scheduled to start construction at the end of 2023, said Eric Rose, spokesperson for the center's developer, Highland Fairview.

0-5.4

In the years since city approval, the developer has dealt with lawsuits, which have now all been settled to pave the way for construction of the center. Planned for the area between Redlands Boulevard and Gilman Springs Road, south of the 60 Freeway, the warehouse project will cover 10% of the city's land, roughly the size of 700 football fields.

The project has been controversial among residents and environmental and conservation groups, who alleged that the warehouse complex would bring traffic, air pollution and negatively affect local wildlife. Supporters said the center would bring much-needed jobs and stability to the city.

- 
- 

O-5.4 Cont.



1 of 6

An artist's rendering shows the World Logistics Center, which is set to break ground in Moreno Valley later this year. (Courtesy of Highland Fairview)

Highland Fairview, a Moreno Valley-based developer, has hired Santec, a design and engineering company, for the project. The firm will bring "future-ready" and sustainable practices to the center, a Santec news release states.

O-5.4
Cont.

The warehouse project plans to be a carbon-neutral facility by adding solar power to its rooftops, reducing water usage by 70% and including 1,080 charging stations for freight and logistics vehicles, employees and visitors, the release states.

More than 33,000 construction and operations jobs will be created, the release states.

The center will have 27 buildings with the option of connecting them via a skybridge, according to the World Logistics Center website.

Skechers already has committed to expanding in Moreno Valley with its second and third warehouses in the city at the logistics center. Its first building — a 1.8 million square-foot center — would be connected with a skybridge to the World Logistics Center, the center's website states.

Though construction is set to begin in late 2023, the project will add 6 million square feet per year until it's completed in 2030. Buildings will be leased throughout the construction phases, Rose said.

The community will benefit from about $22 million in property and sales taxes going to schools and colleges annually, the release states. An estimated $3 billion will be pumped into the economy, the release states.

It's been a bumpy road for the project.

In 2018, Riverside County Superior Court Judge Sharon J. Waters threw out a previous environmental impact report. It wasn't until 2020 that the Moreno Valley City Council approved the revised report.

In 2020, current Moreno Valley Mayor Ulises Cabrera was the only councilmember to vote no on the revised report.

Today, Cabrera is hopeful for the logistics center's future.

"Overall, I'm glad that litigation was resolved, and both sides came to an agreement resulting in additional environmental mitigation measures for the project …" Cabrera said.

A slew of environmental and conservation groups filed lawsuits over the council's approval in 2015, including the California Clean Energy Committee, Center for Biological Diversity, the Sierra Club, the San Bernardino Valley Audubon Society and the Coalition for Clean Air.

O-5.4 Cont.

In 2021, multiple lawsuits were settled between Highland Fairview and environmental groups.

Earthjustice attorney Adrian Martinez, who represented a coalition of environmental groups that settled with Highland Fairview, said he hopes the settlement agreement is implemented.

Martinez and the coalition settled for $47 million. The agreement required the developer to reduce the logistics center's impact on air quality, local wildlife and residents, invest up to $12.1 million in electric vehicles and electric vehicle charging and install rooftop solar panels.

"There is still a lot of work to do to implement the agreement," Martinez said by phone. "I think we hope the settlement will provide some relief … to provide healthy air in the region," he said.

Another settlement required the developer to set aside 2,737 acres for wildlife in western Riverside County, including areas within the logistics center's footprint. Though Susan Nash, attorney for the Friends of the Northern San Jacinto Valley said the Western Riverside County Regional Conservation Authority and the California Department of Fish and Wildlife rejected the land.

O-5.4 Cont.

Nash said she was "blown away" after county and state agencies refused the land, which allowed the settlement agreement to expire in August 2022.

The conservation authority's board had concerns, including the fact that some of the land was outside the logistics center's footprint, a report to the board states.

Deputy Executive Director Aaron Hake, of the Riverside County Transportation Commission, which manages the conservation agency, said that because the commission was not part of the lawsuit, it was not bound to follow terms of the agreement.

Though the land wasn't accepted, the lawsuit remains dead and will have no effect on coming construction plans

NEWS • News

World Logistics Center to break ground in Moreno Valley this year

The 40.6-million-square-foot complex will be as big as 700 football fields



An artist's rendering shows the planned World Logistics Center in eastern Moreno Valley. Now that lawsuits have been settled, the project is set to break ground later this year in eastern Moreno Valley. (Courtesy of Highland Fairview)

By **MONSERRAT SOLIS** | msolis@scng.com |

PUBLISHED: March 8, 2023 at 12:59 p.m. | UPDATED: March 8, 2023 at 4:17 p.m.

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O-5.4 Cont.

First proposed in 2012 and approved by the Moreno Valley City Council in 2015, the World Logistics Center — which would be one of the world's largest logistics centers — is scheduled to start construction at the end of 2023, said Eric Rose, spokesperson for the center's developer, Highland Fairview.

In the years since city approval, the developer has dealt with lawsuits, which have now all been settled to pave the way for construction of the center. Planned for the area between Redlands Boulevard and Gilman Springs Road, south of the 60 Freeway, the warehouse project will cover 10% of the city's land, roughly the size of 700 football fields.

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O-5.4 Cont.

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Monserrat Solis | Reporter
Monserrat Solis covers local news in the Moreno Valley, Hemet, San Jacinto, and Perris for the Southern California News Group. She has written for The San Fernando Valley Sun/El Sol newspaper and L.A.

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O-5.4 Cont.

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O-5.4
Cont.

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Letter O-5

Sierra Club
March 9, 2023

O-5.1 This comment references an email provided by the Sierra Club (included as Letter O-6 below), and states that additional warehouse projects should be considered in the cumulative impacts analysis. In response, please see Topical Response 7 – Cumulative Projects.

Additionally, this comment references an article about warehouse development, and specifically the World Logistics Center, in Moreno Valley. The comment further questions the need for the Project. Please see Topical Response 5 – Jobs, for details regarding job generation, population, and area unemployment. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR. No additional response is required.

O-5.2 This comment addresses the claim that the World Logistics Center would be carbon neutral. This comment is focused on the World Logistic Center project and not on the proposed Project. However, it should be noted that the air analysis included in Recirculated Section 4.2, Air Quality, took regional air emissions, both current and projected future conditions, into account in evaluating the Project's individual and cumulative contribution to air quality impacts. For additional discussion on the topic of air quality, as well as additional mitigation measures incorporated into the Project to address air quality impacts, please see Recirculated Section 4.2, Air Quality.

O-5.3 This comment states that the Draft EIR must consider cumulative projects. Please see Topical Response 7 – Cumulative Projects. This comment generally states that there are uses that could result in fewer impacts than those of the proposed Project. As discussed in Chapter 6, Alternatives, as well as within Topical Response 8 – Alternatives, the Draft EIR adequately considered alternatives to the proposed Project, including those that could achieve most of the basic Project Objectives and could have the potential to result in fewer environmental impacts.

O-5.4 This comment is an article attached to the Sierra Club comment letter and is not specific to the proposed Project.

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Comment Letter O-6

From: George Hague <gbhague@gmail.com>
Sent: Thursday, March 9, 2023 10:36 AM
To: Dan Fairbanks
Cc: Cindy Camargo
Subject: Email copy of Draft EIR for the West Campus Upper Plateau (WCUP) warehouse?
Attachments: West Campus Upper Plateau SC DEIR comments.pdf

Good morning Mr Fairbanks,

Please confirm you have received the attached Sierra Club comments on the West Campus Upper Plateau (WCUP) warehouse Draft EIR and you were able to open them.

Thank you,

George Hague

Begin forwarded message:

From: Dan Fairbanks <fairbanks@marchjpa.com>
Subject: RE: Email copy of Draft EIR for the West Campus Upper Plateau (WCUP) warehouse?
Date: March 9, 2023 at 8:43:45 AM PST
To: George Hague <gbhague@gmail.com>
Cc: Cindy Camargo <camargo@marchjpa.com>

Good Morning George,

I do not see an email from you providing the Sierra Club's comments? Were the comments sent by another individual?

O-6.1

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, #140
Riverside, CA 92518
Phone: (951) 656-7000
Fax: (951) 653-5558
Email: fairbanks@marchjpa.com

-----Original Message-----
From: George Hague <gbhague@gmail.com>
Sent: Monday, March 6, 2023 10:42 AM
To: Dan Fairbanks <fairbanks@marchjpa.com>
Cc: Cindy Camargo <camargo@marchjpa.com>
Subject: Re: Email copy of Draft EIR for the West Campus Upper Plateau (WCUP) warehouse?

Good morning again,

It is if your response is acknowledging you have received Sierra Club's comments on the WCUP's DEIR and were able to open the attachment.

Have a good day,

George Hague

On Mar 6, 2023, at 10:34 AM, Dan Fairbanks <fairbanks@marchjpa.com> wrote:

George,

Was this response satisfactory?

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, #140
Riverside, CA 92518
Phone: (951) 656-7000
Fax: (951) 653-5558
Email: fairbanks@marchjpa.com

-----Original Message-----
From: Dan Fairbanks
Sent: Friday, March 3, 2023 2:51 PM
To: George Hague <gbhague@gmail.com>
Cc: Clerk <clerk@marchjpa.com>
Subject: RE: Email copy of Draft EIR for the West Campus Upper Plateau warehouse?

George,

Thank you for contacting March JPA. The draft EIR and technical appendices are publicly available on the March JPA website at: https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fmarchjpa.com%2fmjpa-meridian-west-campus%2f&c=E,1,uz6Pp9Ucrl-gacRtg-hFKXmeBHkBrnOzj-2ieXIqQ4YxjnCH_AyUwqVWIfU6Nz6h9ZCGRPRoQnJgE4pct9vRdXhlP7gDJXqMCRO_Yjzv4YWmdWanTLdVt0o,&typo=1

Additionally, hard copies of the Draft EIR and technical appendices are available during business hours at the offices of the March JPA at 14205 Meridian Parkway, Suite 140, Riverside, CA 92518.

Unfortunately, the file is too large to send by email through my server, so I request that you use one of the other two other methods to view the draft EIR. Comments are due Friday, March 10, 2023.

Please call me if you would like further assistance in reviewing the document.

Dan Fairbanks
March JPA Planning Director
951 656-7000

-----Original Message-----
From: George Hague <gbhague@gmail.com>
Sent: Tuesday, February 28, 2023 2:18 PM
To: Dan Fairbanks <fairbanks@marchjpa.com>
Cc: Clerk <clerk@marchjpa.com>
Subject: Email copy of Draft EIR for the West Campus Upper Plateau warehouse?

O-6.1 Cont.

Good afternoon Mr Fairbanks,

Please email me a copy of the Draft EIR for the West Campus Upper Plateau warehouse project and let me know when comments are due.

Are the documents also somewhere online?

Thank you,

George Hague

O-6.1
Cont.

Sierra Club comments

SAN GORGONIO CHAPTER

Moreno Valley Group

Good morning Mr Faribanks March 6, 2023

Re: Comments on West Campus Upper Plateau (WCUP) Draft Environmental Impact Report (DEIR)

The Sierra Club appreciates this opportunity to add a few comments to those of many others who do not believe the current West Campus Upper Plateau (WCUP) warehouse project proposal is a good fit in the current location. We live in a non-attainment area and have no control in what we breath as we go about our lives. The WCUP would degrade our air quality to such an extent that 5.3 of the DEIR considers it an "**unavoidable environmental effect**". This is unacceptable in its current proximity to families along with the path its diesel trucks will take. The DEIR reads as follows:

1. As the Specific Plan buildout would result in VOC, NOX, CO, and PM_{10} emission exceedances, the Specific Plan would result in significant and unavoidable impacts and is therefore determined to be inconsistent with the second criterion. (4.2-26)

"As such, even with application of MM-AQ-2 through MM-AQ-15, Specific Plan operational-source emissions impacts would be significant and unavoidable." (4.2-28)

"Air pollution by nature is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used by the SCAQMD to determine whether a project's individual emissions would have a cumulatively significant impact on air quality. The potential for the Project to result in a cumulatively considerable impact, specifically a cumulatively considerable new increase of any criteria pollutant for which the Project region is nonattainment under an applicable NAAQS and/or CAAQS, is addressed in Section 4.2.5, Impacts Analysis. As set forth therein, because the Project would exceed the project-level thresholds for regional VOC, NO_x, CO, and PM_{10} emissions during operation, the Project's cumulative impacts with respect to such emissions would be considerable and significant." (4.2-39)

These different quotes from the DEIR show how this project will impact the nearby residents the most, but also many in the surrounding communities like Riverside/Moreno Valley — especially cumulative. **The DEIR shows that conservation areas do not add to our air quality pollution.**

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Another "**unavoidable environmental effect**" according to 5.3 of the DEIR is Noise. This is also an area the public has little control over and will also suffer its impacts as they try to enjoy life. There are devices you can put on equipment to make the back-up warning devices only slightly above ambient noise level. There are applications you can put on interior walls around warehouses that help dampen the noise within. The Sierra Club did not see either of these or

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other additional measures being taken to reduce physical and mental damage noise can cause to humans. The following is from the DEIR:

"There are no feasible mitigation measures available to reduce the Project's contribution to cumulatively significant traffic noise impacts. Therefore, cumulative traffic noise impacts would remain significant and unavoidable, as well as cumulatively considerable." (4.11-52)

It appears they considered rubberized asphalt, but are to not using it to reduce impacts to people — which is unacceptable.

Again the DEIR reads that the Conservation areas do not cause unacceptable noise levels.

0-6.3 Cont.

The Sierra Club and the public needs to know how many acres and how many jobs was the original goal/mandate of the March Joint Powers Authority. The original documents which show these totals need to be made part of the Final EIR or it will be inadequate. The public needs to have proof that WCUP is needed and required to meet your responsibilities of developing a certain number of acres and providing a certain number of jobs.

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A third "**unavoidable environmental effect"** according to 5.3 of the DEIR is Cultural Resources. The DEIR reads as follows:

"Because all significant cultural resources are unique and nonrenewable, all adverse effects or negative impacts contribute to a dwindling resource base. In the unlikely event that unanticipated archaeological resources are encountered during ground-disturbing activities, mitigation measures MM-CUL-1 through MM-CUL-8 would be implemented. However, given that the Project would result in significant and unavoidable impacts to archaeological resources, the Project's cumulative impacts related to archaeological resources would be cumulatively considerable." (4.4-40)

Again the DEIR reads Conservation of lands do not produce these unavoidable impacts to Cultural Resources.

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The Sierra Club strongly believes making all of the lands available for Conservation/passive park is the preferred alternative — perhaps with some public uses like a fire and/or police station. It would eliminate the three "**unavoidable environmental effects**" listed at 5.3 of the DEIR. With all the existing warehouses/development on lands under the control of the March Joint Powers Authority it appears they have already met their original obligation for jobs and developed acreage. The Final EIR must prove this is not true and how much more is needed to meet their original obligations goals.

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Moreno Valley's 40.6 million sq ft World Logistic Center (WLC) will begin construction in a few months. According to the article in the following link and under my name the WLC will create 33,000 jobs through construction and ongoing operations:

https://csengineermag.com/highland-fairview-names-stantec-as-prime-consultant-on-us25-billion-net-zero-world-logistics-center/

The number of jobs generated by the WLC undercuts the need for the jobs that might be produced by the WCUP. Moreno Valley has also approved three other warehouses which are not built. They include the Moreno Valley Business Park, Compass Danbe Centerpointe and the Moreno Valley Business Center. This Thursday, March 9th, they are poised to approve the Cottonwood & Edgemont warehouse for a fourth. All these soon to be built warehouses in addition to the WLC's 33,000 jobs undercuts the need for the WCUP to provide jobs as a main reason to approve another warehouse project with all its toxic/negative impacts.

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The WLC article also explains some of their measures to achieve Net Zero operations and significant water savings as well as other measures which should have already been incorporated into the WCUP. The Sierra Club expects to see them in the Final EIR for the WCUP.

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The Sierra Club would appreciate being added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Please email that information to me and in addition mail information to the address under my name.

0-6.9

Sincerely,

George Hague
Sierra Club
Moreno Valley Group
Conservation Chair

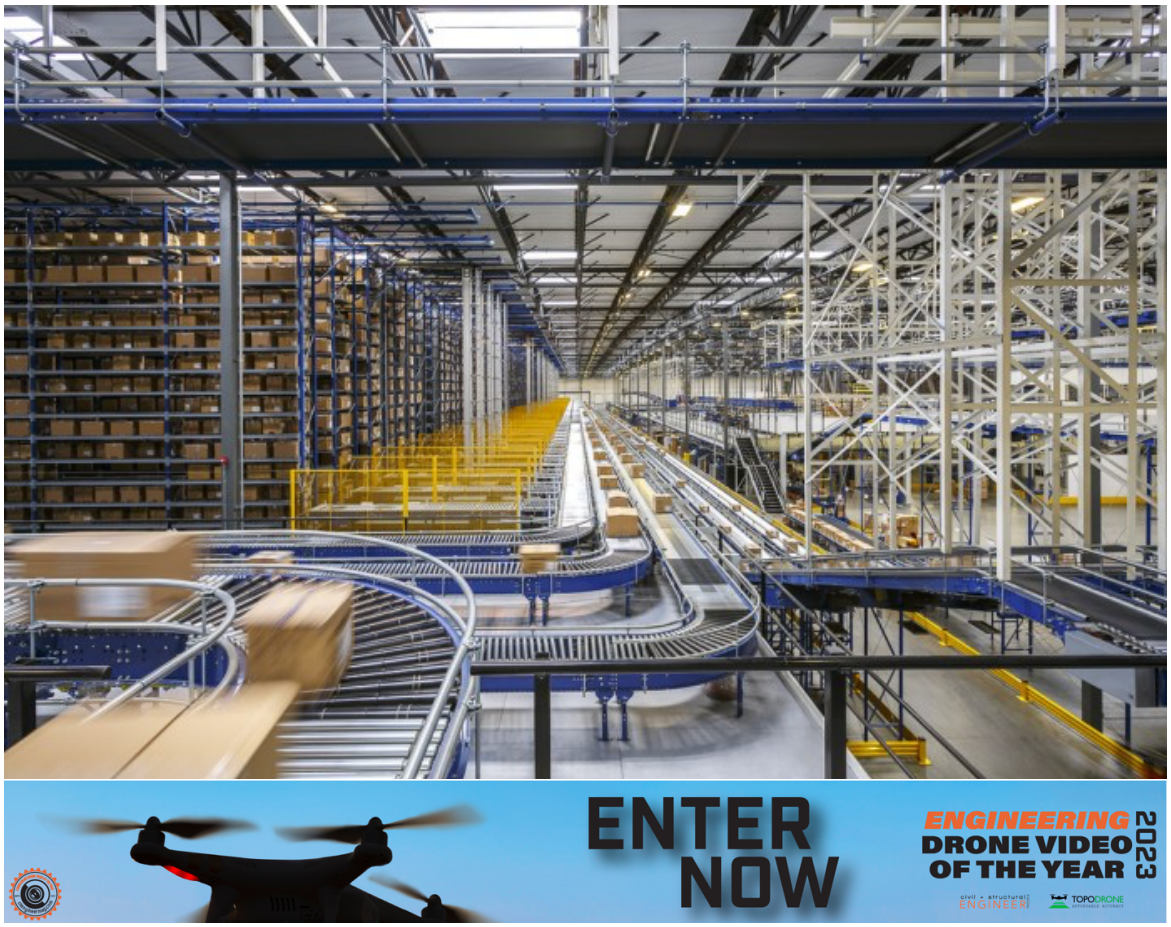
P.O Box 1325
Moreno Valley, CA 92556-1325

Highland Fairview names Stantec as prime consultant on US$25 billion net zero World Logistics Center

The 4-square-mile site will house the largest net zero logistics development in North America

February 14, 2023

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Stantec, a global leader in sustainable design and engineering, has been selected as the prime consultant for private real estate developer Highland Fairview's World Logistics Center project in Moreno Valley, California. The estimated US$25 billion investment will be constructed over seven years and will be the largest planned logistics and business park in North America, serving as a distribution center for destinations across North America. More than a freight hub, the net zero development will contain 40-plus million square feet of facilities over 2,600 acres, including walkable streets, cafés, restaurants, spaces for arts and culture, breweries, and public space.

Stantec's work will focus on future-ready and highly sustainable infrastructure. The work includes civil engineering, industrial buildings architecture, geomatics, water and wastewater design, landscape architecture, urban planning, smart mobility and AV consulting, funding consulting, as well as energy and innovation design.

"The World Logistics Center is a major commitment in the next generation of sustainability and logistics operations," said Iddo Benzeevi, president and CEO of Highland Fairview. "Our engineering partnership with Stantec will be important in our success, bringing all our combined engineering and design pieces together in a fully integrated operation to execute our vision and bring it to reality."

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Cont.

Supply chain solutions

The World Logistics Center is in the center of Southern California's Golden Triangle, a region that encompasses Los Angeles, Orange, and San Diego Counties and the Inland Empire—the nation's largest manufacturing and logistics hub with a direct connection to the busiest seaport and three of the busiest airports in the US. More than 40% of goods coming to the US pass through the Golden Triangle. Housing multiple national brands and logistics providers, the center will be capable of overnight delivery to the 11 western states and within-three-day goods delivery from port to facility to any destination in the continental United States.

The World Logistics Center will maximize supply chain efficiency by using SCADA systems to integrate logistics providers for coordination. This strategy ensures the maximum number of trucks depart full by carrying shipments from multiple providers, as needed. The end result will be increased shipping efficiency, better use of transportation resources, and reduction of carbon emissions.

Net zero and sustainability

The World Logistics Center is committed to and is planned to provide a carbon neutral facility, making it the largest sustainable logistics cluster in the US.

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"Highland Fairview's vision for a net zero and sustainable economic center has not yet been tackled on this scale in the US," said Brianna Daniels, principal-in-charge for Stantec. "We are proud to be a part of this inspirational project that will have such positive community outcomes in Moreno Valley and around North America."

With 40-plus million square feet of rooftops, the center will have a vast capacity for solar power integration. Stantec will examine the use of battery storage and microgrids on site to increase energy resilience, with the expectation that the facility will not have to rely on the external power grid.

The center will also prioritize water conservation, a critical issue in California. Facility design is expected to result in a 70% reduction in water usage compared to the current general plan for the City of Moreno Valley. This will lead to a savings of 653 million gallons of water every year—enough water for 27,000 households. Drainage through the site will be treated before it is discharged, while paying careful attention to maintaining historic drainage patterns and protecting the downstream environment.

"The scale of this iconic project and its focus on sustainability creates a unique opportunity to advance the development of sustainable construction and

operational practices in industrial buildings," said Dave Calder, global industrial sector leader for Stantec.

Mobility innovation

The World Logistics Center site will be future-ready for budding technologies, while tapping into the latest mobility solutions. That applies to freight and passenger travel to and from the site as well as within the site. The facility will be fully EV-ready, with 1,080 charging stations committed as part of the design. Chargers will be available for freight and logistics vehicles, employees, and visitors.

Autonomous vehicle (AV) technology is also being explored for the site through Stantec's autonomous vehicle consulting arm, Stantec GenerationAV®. Trucking is set to be one of the first industries to break through on AV technology, and the World Logistics Center will be ready to take a lead role in their integration. Highland Fairview is currently in discussion for the acquisition of zero-emission semi-trucks, and AV shuttles are being explored as a means of local travel within the development.

Community and economic impact

Stantec-led project visioning and innovative placemaking will offer restaurants, cafés, and recreation facilities to give the center the feel of a miniature city and a desirable new employment destination in Moreno Valley.

Over 33,000 jobs will be created through construction and ongoing operations, with an estimated US$22 million in property and sales taxes generated annually for schools and community colleges. The overall economic benefit of the World Logistics Center is estimated at nearly US$3 billion in economic benefit to the region.

Stantec's project team will include 300 professionals in civil and electrical engineering, urban planning, and other disciplines dedicated to meeting the aggressive project schedule. A core team will be co-located with Highland Fairview on the project site, with additional resources supporting from across North America. Michael Baker International will design the needed interchange for access to the site, ENGEO Engineering will provide geotechnical engineering, and Dudek will provide environmental permitting.

Project design is currently underway, with construction slated to start in 2023. The project will add six million square feet per year until projected completion in 2030.

0-6.10 Cont.

Printed on Recycled Paper. ....To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness.

Letter O-6

Sierra Club
March 9, 2023

O-6.1 This comment is the transmittal email for the comment letter. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR.

O-6.2 This comment raises concern over the placement of the Project within a non-attainment area, in particular given its significant and unavoidable air quality impacts. Please see Recirculated Section 4.2, Air Quality, for additional discussion regarding cumulative air quality impacts and additional mitigation measures added to the Project.

O-6.3 This comment raises concerns regarding noise impacts. Based on the findings of the Project Noise Analysis (Appendix M-1), the EIR determined the Project would result in less than significant construction noise impacts. As detailed further in Section 4.11, Noise, the impact analysis is based on quantifiable thresholds and relies on existing regulations and project design features to reduce impacts. The Project would have less than significant impacts due to construction noise and no mitigation is required. However, the Project includes PDF-NOI-1 through PDF-NOI-3, which would limit the hours of construction and blasting and drilling activities. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Mitigation is required when there is a potentially significant environmental impact. With regard to on-site operational noise, the Draft EIR determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant. Section 4.11, Noise, of the Draft EIR evaluated the mitigation potential of rubberized asphalt but determined such a measure would not lower off-site traffic noise levels below the level of significance for Roadway Segment #13, so the Project's noise impacts for Roadway Segment #13 are significant and unavoidable.

O-6.4 This comment requests that the EIR include the number of acres and jobs that were included within the original goal/mandate of March JPA. The March JPA General Plan describes the March JPA Planning Area as approximately 6,500 acres, nearly two-thirds of which are undeveloped or under-utilized. Please see Topical Response 5 – Jobs, for details regarding the Project's job generation.

O-6.5 This comment raises concerns regarding significant and unavoidable impacts associated with archaeological resources, as well as cumulatively considerable impacts associated with cultural resources, as stated in Section 4.4, Cultural Resources. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), the Phase II testing and evaluation program has been completed and was done in consultation with both the Pechanga and Soboba Bands. Consultation between representatives from March JPA, the Soboba Band of Luiseño Indians, and the Pechanga Band of Indians resulted in an agreement regarding the scope and methods for the Archaeological Test Plan (ATP), which were approved by March JPA in March 2023. Archaeological testing in compliance with the ATP occurred between March 20, 2023 and March 31, 2023. As detailed in the Project Phase II Cultural Resources Assessment (Appendix E-1), the archaeological testing and evaluation within the Area of Potential Effect (APE) included sites CA-RIV-4067, CA-RIV-5420, Temp-2, Temp-3, and Temp-9

to Temp-15. While Site CA-RIV-5420 contains features both within and outside of the APE, testing at this location primarily focused on those within the APE. Due to their proximity to the APE, the areas of sites CA-RIV-5811, CA-RIV-5812, and CA-RIV-5819 containing milling features were marked and not tested to ensure all milling features would not be impacted by the Project. Testing at these sites was instead conducted within adjacent areas, primarily within the APE, to confirm that the site boundaries do not extend into the APE. At the request of the consulting tribes, seven additional exploratory shovel test pits (STPs) were excavated within the APE at locations of their choosing. In total, 75 STPs were excavated, and no archaeological material was identified.

No testing occurred at CA-RIV-5421 since the site was previously tested and evaluated as not eligible for the National Register of Historic Places (NRHP) by McDonald and Giacomini in 1996. Testing was also not conducted at CA-RIV-4068 since the site is clearly outside of the APE; however, this has been included in the study at the request of March JPA and the consulting tribes. (Appendix E-3)

Based upon the records search, surveys, and testing program, sites CA-RIV-4067, CA-RIV-5420, CA-RIV-5421, Temp-2, Temp-3, and Temp-9 to Temp-15 are not eligible for the California Register of Historical Resources (CRHR) or the NRHP. Sites CA-RIV-4068, CA-RIV-5811, CA-RIV-5812, and CA-RIV-5819 were not evaluated for significance as they were found to have no elements within the APE. (Appendix E-3)

The Project Phase II Cultural Resources Assessment (Appendix E-1) presents revised conditions, which were formulated based upon input by the Pechanga Band and consultation between the tribes, March JPA, and the Applicant. These conditions will be incorporated into the MMRP. These conditions primarily consist of efforts to either preserve in place or relocate (move) bedrock milling features, monitoring of ground-disturbing activities by an archaeologist and Native American observer, and controlled grading within the vicinity of any recorded site to ensure the timely and proper handling of any inadvertent finds. (Appendix E-3) The revised conditions are detailed in Section 4.4, Cultural Resources, of the Final EIR. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

O-6.6 This comment requests consideration of an alternative making the land available for conservation and passive park uses, as well as public uses including fire and police stations. Please see Topical Response 8 – Alternatives for a discussion of a park alternative. The comment further requests proof of the need for jobs. Economic proof for the need for jobs is outside the scope of CEQA; however, see Topical Response 5 – Jobs, for additional information about jobs, population, and unemployment. As discussed in Recirculated Chapter 3, Project Description, and Topical Response 6 – Meridian Fire Station, the Project will construct the Meridian Fire Station as a Community Benefit.

O-6.7 This comment identifies additional warehousing projects in Moreno Valley. Please see Topical Response 7 – Cumulative Projects for a discussion of the development of the cumulative projects list. The comment asserts that the development of these projects would undercut the need for the jobs that the Project would provide. See Topical Response 5 – Jobs, for a discussion about the jobs to be provided under the Project.

O-6.8 The comment also requests that the Project incorporate measures to reduce greenhouse gas emissions and water usage, as well as other environmental measures similar to those proposed for the World Logistics Center project (WLC). Please see Recirculated Section 4.2, Air Quality, and Topical Response

2 – Air Quality, for a discussion about additional mitigation measures, that will be incorporated into the proposed Project to address air quality and GHG impacts and a discussion regarding the Project consistency with the WLC air quality measures.

O-6.9 This comment requests that the Sierra Club be added to the public interest list and receive any further public documentation associated with the Project. The Sierra Club has been added to this list.

O-6.10 This comment is an attached article entitled "Highland Fairview names Stantec as prime consultant on US$25 billion net zero World Logistics Center." This comment does not raise any specific issues or questions regarding the adequacy of the environmental analysis included in the Draft EIR.

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Comment Letter O-7

From: Susan Phillips <susan_phillips@pitzer.edu>
Sent: Thursday, March 9, 2023 8:10 PM
To: Dan Fairbanks
Cc: Michael McCarthy; Angelica Gonzalez Apple; Teresa Spezio; Claudia Prats
Subject: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: RRC WCUP Cultural Resources Letter.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority Draft Environmental Impact Report for the West Campus Upper Plateau Project.

On behalf of the Redford Conservancy for Southern California Sustainability at Pitzer College, I attach a comment letter on the Cultural Resources section of the DEIR as well as other matters.

O-7.1

Please email me to confirm receipt of this public comment.

Thank you for your time,
Susan

Susan A. Phillips
Professor of Environmental Analysis
Associate Dean, Pitzer College
Director, Robert Redford Conservancy for Southern California Sustainability

Drop by, in-person office hours in Scott 232 @ Pitzer: M 2:30-3:30
At the Conservancy, Th 12-1.
Please schedule virtual meetings using the link below
https://calendly.com/susan_phillips/meetings

Robert Redford
CONSERVANCY
for Southern California Sustainability
PITZER COLLEGE

March 10, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

On behalf of the Robert Redford Conservancy for Southern California Sustainability at Pitzer College, we respectfully urge you not to approve the West Campus Upper Plateau Project DEIR project. This project could transfer more than 800 acres of open space to a private developer without assurances that historic and cultural resources will be protected or made accessible. The resources on site at March JPA are irreplaceable. The grading, construction, paving, roads and other human created disturbances generated by this warehouse development will have devastating consequences on the area's ecosystem and will severely impact its cultural integrity, as well as creating negative health, traffic, and viewshed impacts for surrounding communities. Most alarmingly, this project's approval threatens to create significant rifts within the surrounding community–social divisions and potential flight from surrounding neighborhoods in addition to, and as a result of, environmental harms and the destruction of cultural heritage. O-7.2

The West Campus Upper Plateau Project will create significant adverse impacts on multiple stakeholders, and on the historical and cultural sites that were identified during the archeological survey. A transfer of the nation's resources that include military history and tribal resources to a single private stakeholder and industrial use sets a dangerous precedent—especially during a time when climate change is looming, and the preservation of open lands is paramount for natural carbon sequestration and the maintenance of bioproductive lands and biodiversity. We urge the Commission to reject this proposal and to consider the alternative plans presented by the community. O-7.3

Key Concerns:

According to DEIR p 4.4-15 "based upon the records search and literature results, there is a high potential to discover both prehistoric and historic resources within the APE beyond the already recorded sites." We agree with this assertion, and would like to know how the conflict between O-7.4

likely discovery of prehistoric and historic resources and the use of blasting at the site will be resolved.

O-7.4 Cont.

We urge you to follow the recommendation in Appendix E that an archaeological significance evaluation of the sites be completed to evaluate if the resources are eligible for listing on the California Register of Historical Resources (CRHR) and NRHP. We find the conclusion that the significance of cultural resources and tribal archaeological resources are ineligible for listing to merit further investigation. In fact, it is feasible not only to consider individual instances of buildings as cultural resources, but to consider such resources collectively, as well as to consider this site's unique confluence of prehistory and history, between tribal and military history as a whole–cumulatively as opposed to broken into categories. We revisit this notion below.

O-7.5

We request access to the documents related to AB 52 consultation, including the draft Testing Plan under review, which are reported to be on file with March JPA. If such materials cannot be made public due to tribal sensitivity, we request that the DEIR approval process be halted until the draft Testing Plan and tribal consultation is complete.

O-7.6

Some places in the document indicate that tribal consultation is ongoing, and that tribal representatives will be present for the staking of the site and any associated archaeology. Other places in the DEIR indicate that tribal consultation has been halted. We found this paragraph particularly concerning: "At the direction of March JPA, Brian F. Smith and Associates, Inc. contacted the Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians to solicit their involvement with the proposed Project. A site visit with representatives from both tribes and March JPA was conducted on February 16, 2022. The local tribal governments suggested the presence of a Traditional Cultural Property (TCP) and potentially a Traditional Cultural Landscape (TCL) within the vicinity of or overlapping the APE. However, the recorded boundary of a potential TCP/TCL was not fully identified or formally presented to Brian F. Smith and Associates, Inc. Since the boundary of the potential TCP/TCL is unknown, effects cannot be determined without direct consultation with the local Native American tribes through government-to-government consultation." If you continue to work with tribal representatives, then it follows that further information about potential TCP and TCL can be solicited from those representatives.

We request that DEIR approval be postponed until a recorded boundary for the TCP/TCL is identified and considered in collaboration with tribal representatives.

O-7.7

We also request further information regarding the following: "Under Alternative 4, Barton Street would be realigned to the east to avoid *a known cultural resource site* that otherwise would be directly impacted under the proposed Project during construction activities." Which known cultural resource is this referring to? Please provide information about this known cultural resource site for public consideration.

O-7.8

There are several additional contradictory statements within the Cultural Resources section of the DEIR regarding historical resources that need to be rectified:

"While Buildings A1 to A14 are the only United States Air Force associated munitions storage igloos in California, they are not unique, military-related munitions storage structures in California." Please clarify what this means. If they are the only examples of such buildings associated with the USAF, it follows that they are unique examples of munitions storage igloos. 0-7.9

In one part of the document (4.4-19), the DEIR states that buildings A1-A14 "retain both integrity of design and integrity of materials," while later the same section indicates that "none of the buildings retain high degree of integrity." It's unclear if this statement is referring simply to buildings B-F or also includes A1-A14 which are referenced earlier in the paragraph. 0-7.10

Please provide an explanation for why adaptive reuse of the buildings is not an option. Adaptive reuse is often an excellent option that can minimize the carbon footprint of a project, further qualifying construction for LEEDS certification. 0-7.11

We would also like further clarification about the DEIR's focus on the "evolution" igloo styles. Repeated several times throughout the DEIR and Appendix E are the criteria for listing on the NRHP and CRHR, which are based on four main areas of significance: architecture, archeology, engineering, and culture. The cultural significance criterion, applicable in this case is defined as "properties that embody **the distinctive characteristics of a type, period, or method of construction**, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction." Excluding the igloo styles from NRHP categories based on their lack of representing a "transitional style," or "evolution from one style to the next," is repeated several times in the DEIR. Being in a transitional style or representing the evolution of an architectural style is not a criterion for listing on the NRHP or CRHR. The igloos are properties that "embody the distinctive characteristics of a type, period, or method of construction," and thus fall within NRHP and CRHR guidelines. 0-7.12

The remains of Camp Haan also present some very important opportunities for historical and archaeological research and appear to be clearly eligible for listing in the NRHP under Criterion A and D (and consequently, for listing in the CRHR under Criteria 1 and 4).

As the only Air Force Igloo style military munitions storage bunkers in California, as the site of Camps Hahn, which housed prisoners or war, as a site with multiple tribal, cultural, and paleological resources below mean that this site has a very rich cultural history that should be learned from, incorporated into site design, and made publicly accessible. Placing warehouses on this site is ill advised when the preservation, enhancement, and integration of the valuable cultural resources have such clearly powerful potential. Job growth is the only criteria used to justify the proposal to build the warehouse project. But warehouse jobs are both low density and low quality, and will be further automated. Industrial zoning will additionally cause more 0-7.13

intensive uses, and thus decreased engagement with, and potentially wholesale destruction of, this incredible cluster of cultural resources.

O-7.13 Cont.

Additionally, moving forward with the project as it stands may constitute a violation of CEQA. If a project "defers mitigation," according to CEQA, it also needs to name a performance standard. We note that in the Cultural Resources section, the project defers mitigation but does not give a performance standard (example of performance standards could be that all cultural impacts will be avoided, or significant artifacts will go into a museum, etc.) Since there is no performance standard, it is not clear to the public what the plan is. This is a violation of CEQA disclosure requirements.

O-7.14

Tribal Cultural Resources

Section 4.4 Cultural Resources

Multiple cultural resource sites (CA-RIV-4067, CA-RIV-4068, CA-RIV-5420, CARIV-5811, CA-RIV-5812, CA-RIV-5819, Temp-2, Temp-3, and Temp-9 to Temp-14) have been identified within the archaeological survey. This project may represent a direct or indirect adverse impact to the cultural resources/historic properties. A great deal of work has been done over the decades in how to approach bedrock milling sites, for example, and what can be learned from them. Blood protein residue analysis has shown that it may be possible to identify seasonal procurement of various small fauna used for food by taking samples from milling surfaces. Other studies have attempted to quantify probabilities for the presence of artifact deposits at the foot of bedrock milling features. In other words, the significance of the milling sites and the research they might produce will likely increase with changes in technology–and indeed already has since these were made.

O-7.15

Historic resources and military history

March is one of the oldest airfields operated by the United States military, being established as Alessandro Flying Training Field in February 1918. It was one of thirty-two Air Service training camps established after the United States entry into World War I. The attack on Pearl Harbor in December of 1941 quickly brought March Field back into the business of training aircrews.

The March Field Historic District is the most significant cultural resource identified within the planning area. The March Field Historic District has been nominated for listing on the National Register of Historic Places (NRHP) upon concurrence by SHPO. Furthermore, under the governance of the U.S. Air Force, a Cultural Resource Management Plan (CRMP) for March AFB was prepared, which includes a maintenance manual for the Historic District.

O-7.16

There is case law in California supporting the historical preservation of multiple buildings as a collective. Please assess how separate military buildings (and tribal resources) can be listed as one collective resource, and therefore, should merit preservation. One key case in California where cultural resources were treated collectively instead of individually is the Native American

Heritage Commission v. County of Santa Clara case in 1997. The court ruled that under CEQA that the EIR for the proposed development project must take into account the cumulative impact on **all tribal cultural resources** in the area, not just those that were individually identified. Please assess the collective impact of tribal archaeological and historic resources, rather than just taking them as individual or separate sites.

0-7.16 Cont.

Please indicate how grinding stone clusters will be avoided in construction, as well as taken as a collective resource that deserves public access and public education information. We argue that the in-situ grinding stones be avoided and incorporated into the proposed alternative plans, that mitigation for construction involve education about tribal communities that utilizes these in-situ resources, as well as maintaining the public's ability to visit the sites.

0-7.17

Preserving the buildings and cultural resources as a collective can be incorporated into each of the projects proposed in the Community Alternatives letter. The alternative buildings could seamlessly integrate into and enhance projects such as veteran housing, public park space, or UCR campus. We believe site preservation would provide added value to any proposed housing project surrounding this historic site and could act as a site for experiential learning at UCR as well as providing blue-green jobs.

0-7.18

As you may know, the US Fish and Wildlife has been instrumental in protecting some of the most significant natural and cultural resources in the United States. Through its management and preservation efforts, the USFW has helped to protect not only the natural beauty of our parks but also important cultural resources, including military sites. The **Air Force Natural Resource Partnership** have conserved over 10 million acres on Air Force lands that include over 100 military sites. The cultural heritage of this site merits same principles of preservation and management to be applied to the West Campus Upper Plateau Project, ensuring that any development in the area is conducted in a responsible and sustainable manner. A decision to preserve this land instead of developing it into a warehouse will constitute an approach to protecting land and cultural resources that can serve as a model for responsible development and preservation efforts throughout the region.

0-7.19

Paleontological resources

The West Upper Plateau lies above the Elsinore Fault Zone and on the east by the San Jacinto Fault Zone. Public Law 74-292 (the National Natural Landmark Program, implemented by Title 36 CFR 62) cites that paleontological resources with significant value are those with "illustrative character, present condition, diversity, rarity, and value for science and education." The geology mapped at the Project site is mostly underlain by the Cretaceous-aged Val Verde tonalite, a type of crystalline plutonic rock related to granite. Scattered linear outcrops of Cretaceous granite dikes, Paleozoic biotite. The eastern portion of the development site includes lower Pleistocene fan deposits which have a "high" paleontological sensitivity for the occurrence of terrestrial vertebrate fossils at shallow depths. Disturbance of any potential terrestrial vertebrate fossils within the Pleistocene fan deposits, therefore, could result in

0-7.20

potentially significant impacts to paleontological resources. How will grading be monitored to assure that these paleontological resources will not be impacted? O-7.20 Cont.

Additionally, given the presence of quaternary-age fossils and Pleistocene fan deposits in "alluvial deposits near the planning area," such as in San Timoteo Canyon north of the site, the assessment that the planning area does not contain significant paleontological resources is unclear. It is however stated in the report that the "eastern portion of the development site includes lower Pleistocene fan deposits which have a "high" paleontological sensitivity for the occurrence of terrestrial vertebrate fossils at shallow depths," exemplifying that the significant disregard of any potential paleontological significance in all areas of the site. Will the paleontological considerations provided to the conservation easement in the eastern portion of the site be matched for other areas of the site? Even more concerning is the admittance that, despite the already severe lack of paleontological precautions and assessments under MM-CUL-1 and MM-CUL-6, the Project will nonetheless result in "significant and unavoidable impacts to historical and archaeological resources," as well as paleontological ones that will be further disregarded if they are deemed insignificant. O-7.21

This lack of thorough examination is especially concerning given the assertion in the Executive Summary that the March JPA intends to reduce monitoring of paleontological resources in the case that "potentially fossiliferous units are not present in the subsurface" or if discovered fossils in these areas are determined to have "low potential to contain or yield fossil resources" by a qualified paleontological personnel. It should be emphasized that this qualified personnel should be an independent third-party with no connections to the developers or contractors that may bias their assessment. Furthermore the DEIR states that the report, "when accepted as satisfactory by the March JPA, will signify satisfactory completion of the project program to mitigate impacts to paleontological resources," highlighting how a concerning lack of third-party or unbiased input on paleontological standards may yield biased assessment and outcome. How will the project ensure its use of unbiased contractors in consultation about paleontological resources? We also note that the County of Riverside may be the enforcement agency during the grading process and thus March JPA should harmonize its standards to the same levels as County requirements. O-7.22

The EIR mentions the use of Blasting & Rock Handling of up to 20 acres per day. The EIR says "Full time monitoring of grading or excavation activities shall be performed starting at a depth of 4 feet below the surface in undisturbed areas of Pleistocene sedimentary deposits within the project's boundaries" (Table 1.2 in Executive Summary, page 73). How will full-time monitoring occur if blasting is used as a method at the project site? O-7.23

An example of a military site as well as tribal cultural resources, referencing CEQA, is the case of Jamul Action Committee v. Chaudhuri in 2017. In this case, the court ruled that the EIR for a proposed casino project should have included an analysis of the cumulative impact on both the Jamul Indian Village's cultural resources and the adjacent Camp Lockett, a former military training site that was also identified as a cultural resource. The court held that the EIR's analysis of the project's impact on cultural resources was deficient because it did not properly evaluate O-7.24

the cumulative impact on these two distinct but interconnected cultural resources. This project presents an analogous example. We request more information about the cumulative impacts on all the cultural resources listed in Appendix E and in the DEIR.

O-7.24 Cont.

NEPA

The H.R. 1904 requires review under National Environmental Policy Act (NEPA), 42 U.S.C. 9 4332, only *after* the land transfer is complete. Such ex post facto review is clearly contrary to the spirit and intent of NEPA which requires that federal agencies analyze alternatives prior to making decisions that would affect the environment

O-7.25

Conclusion

Because of the preceding, we respectfully urge you to fully address each of these issues and mitigate or provide alternative for the West Campus Upper Plateau Project.

O-7.26

First, March JPA should order a review under NEPA.

O-7.27

Second, a historic resources review process should be included as required by NHPA, with the approach that the cluster of military buildings and tribal resources be a) accessible and 2) taken as a collective historical resource under CEQA. These two changes will ensure that before any exchange commences there has been an adequate assessment of the risks involved in the land transfer and that cultural resources on the land to be transferred can be retained, or at the very least, the effects of their loss mitigated.

O-7.28

Part of the reason that military sites are so important as preservation sites is that land that might otherwise have been developed often lays fallow for decades. This allows biodiversity to flourish. It also allows for the preservation of unique resources through time—in this case providing a confluence of several tribal cultural sites and military structures that make the site absolutely unique. Military sites also provide greenspace, providing water filtration, cooling, and recreational opportunities for residents in an area already heavily impacted by industrial development.

O-7.29

Sincerely,



Susan A. Phillips
Associate Dean
Professor of Environmental Analysis
Director Robert Redford Conservancy

Letter O-7

Redford Conservancy at Pitzer College
March 9, 2023

O-7.1 This comment is introductory in nature and summarizes what is being transmitted by the commenter.

O-7.2 This comment expresses general opposition to the Project. Specific comments regarding the Draft EIR are provided and responded to below. The comment incorrectly asserts the Project would transfer 800 acres to a private developer. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant.

O-7.3 This comment requests the consideration of a non-industrial alternative. In response, please see Topical Response 8 – Alternatives.

O-7.4 The comment raises concerns regarding the potential for Project construction activities to potentially affect both prehistoric and historic resources. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), Phase II testing of resources within the Area of Potential Effect (APE) has been completed and it has been determined that no significant archaeological resources are present within the APE. Although no archaeologically significant resources would be impacted by the Project, the bedrock milling features are still viewed as culturally important to the Soboba and Pechanga Bands. Consultation between the Tribes, March JPA, and the Applicant has led to the development of revised conditions related to the prehistoric sites, which have been incorporated as mitigation measures in the Final EIR. These conditions primarily consist of efforts to either preserve in place or relocate (move) bedrock milling features, monitoring of ground-disturbing activities by an archaeologist and Native American observer, and controlled grading in the vicinity of any recorded site to ensure the timely and proper handling of any inadvertent finds (see Mitigation Monitoring and Reporting Program [MMRP]). Further, as recommended by the Paleontological Assessment, MM-GEO-2 requires that alternative rock breaking methods, such as expanding chemical agents (epoxy resin), be used in the area of identified resources and therefore there will not be a conflict as suggested by the comment. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

O-7.5 This comment requests completion of an archaeological significance evaluation of the Project site to determine eligibility for listing on either the CRHR and/or the NRHP. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), Phase II testing has been completed and the results of the updated technical study will be incorporated into the Final EIR. The Phase II testing and evaluation program was done in consultation with both the Pechanga and Soboba Bands. Consultation between representatives from March JPA, the Soboba Band of Luiseño Indians, and the Pechanga Band of Indians resulted in an agreement regarding the scope and methods for the Archaeological Test Plan (ATP), which were approved by March JPA in March 2023. Archaeological testing in compliance with the ATP occurred between March 20, 2023 and March 31, 2023. Based upon the records search, surveys, and testing program, sites CA-RIV-4067, CA-RIV-5420, CA-RIV-5421, Temp-2, Temp-3, and Temp-9 to Temp-15 are not eligible for the California Register of Historical Resources (CRHR) or the National Register of Historic

Places (NRHP). Sites CA-RIV-4068, CA-RIV-5811, CA-RIV-5812, and CA-RIV-5819 were not evaluated for significance as they were found to have no elements within the APE.

Regarding the Cold War-era March AFB Weapons Storage Area (WSA) found within the Project site, these elements are studied independently from the prehistoric resources as there is no tangible connection between the historic and prehistoric land use. Rather, the historic land use of the property actually diminishes any potential integrity of some of the prehistoric sites. (Appendix E-3) See Response O-7.16, below for additional discussion.

O-7.6 This comment requests the records of the Assembly Bill 52 (AB 552) government-to-government consultation process. This consultation process is confidential between the lead agency and tribal governments. This information is not for public review. Likewise, any study that shows cultural resources is protected from public review. Government Code Section 6254.10 specifically exempts from disclosure requests for:

> *[R]ecords that relate to archaeological site information and reports maintained by, or in the possession of, the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the [Native American Heritage Commission], another state agency, or a local agency, including the records that the agency obtains through a consultation process between a California Native American tribe and a state or local agency.*

Phase II testing has been completed and the results from the updated technical study have been incorporated into the Final EIR. See Response O-7.5, above, for a summary of the archaeological testing results.

O-7.7 This comment requests that the Traditional Cultural Property and potential Traditional Cultural Landscape boundaries be fully recorded. At this time, consultation is ongoing, and both the Pechanga and Soboba Bands have been active partners with March JPA and the consulting archaeologist on the identification of resources, Phase II testing, and appropriate conditions for development of the property.

O-7.8 This comment requests more detail about Alternative 4 and the realignment of Barton Street. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), based on additional testing completed, as discussed in Response O-7.5 above, all archaeological resources in proximity to Barton Street were evaluated, determined not to be eligible for the CRHR, and therefore not significant under CEQA criteria. Further, cultural and tribal resources are protected from public review pursuant to Government Code Section 6254.10. Please see Response O-7.6, above.

O-7.9 This comment asserts that there are contradictions within the EIR with regard to Igloos A1 through A14. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), the Weapons Storage Area (WSA) report included as Appendix E-2 to the Draft EIR, as well as the text within Section 4.4, Cultural Resources, erroneously stated the WSA igloos were the only United States Air Force-associated munitions storage igloos in California. Travis Air Force Base in Fairfield includes munitions storage igloos as part of the Travis AFB ADC Readiness National Register Historic District Area. Munitions bunkers are also found at Beale Air Force Base in Marysville and Edwards Air Force Base in Edwards. Further, as detailed in the revised WSA report included in Appendix E-2 of the Final EIR, the WSA igloos are not unique or distinctive examples of munitions storage igloos in California or

the local region and are among the most common military-related weapons storage constructions. For example, similar igloos are regionally found at the Fallbrook Ammunition Depot, Naval Weapons Station Seal Beach, and Marine Corps Air Station El Toro. Additionally, Concord Naval Weapons Station in San Francisco includes a larger weapons storage area that features various underground and overground bunkers constructed in different periods and styles. Sierra Army Depot in Herlong includes over 800 munitions storage igloos and igloos remain from the closed Benicia Arsenal in Benicia. As detailed in Appendix E-2 of the Final EIR, the WSA and its individual buildings were determined not eligible under NRHP, CRHR, or March JPA CEQA Guidelines criteria for historic resources. The WSA report, as well as the text within Section 4.4, Cultural Resources, of the Final EIR, has been revised to accurately describe the state and regional context for the WSA igloos. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

O-7.10 This comment questions whether the conclusions of integrity apply to Buildings B through F or also include Igloos A1 through A14. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3) and detailed in Appendix E-2 of the Final EIR, the WSA and its individual buildings were determined not eligible under NRHP, CRHR, or March JPA CEQA Guidelines criteria for historic resources. The statement was updated to reflect that of the seven aspects of integrity, Igloos A1 to A14, Buildings B, D, E, F, and G, and the WSA buildings, collectively, were determined to retain integrity of location, design, and materials. Building C was determined to only retain integrity of location. None of the buildings, individually or collectively, retain integrity of setting, and they never possessed integrity of workmanship, feeling, or association.

O-7.11 This comment questions why adaptive reuse was not considered as an alternative to the Project. Adaptive reuse of the dilapidated buildings and the igloos structures was not considered because these buildings and structures would not physically accommodate the uses proposed by the Project. For additional information regarding project alternatives, see Chapter 6, Alternatives, as well as Topical Response 8 – Alternatives.

O-7.12 This comment asserts that the igloos are properties that 'embody the distinctive characteristics of a type, period, or method of construction,' and thus fall within NRHP and CRHR guidelines. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3) and detailed in Appendix E-2 of the Final EIR, most of the ammunition and explosive magazines were constructed during and after World War II. The construction of these storage structures started as a part of the nation's large-scale mobilization during World War II. From 1939 to 1945, the United States government spent hundreds of millions of dollars to construct 77 new military industrial facilities and 16 major ordnance depots. These igloos were commonly covered with earth and featured concrete building material. Although the floor is at or above the ground level, because the magazine is covered with earth on three sides, it is considered underground. The structure underneath the earth-covered portion is barrel-arched and constructed from reinforced concrete. The use of the barrel-arch design directs the force of a potential explosion upward, rather than outward, decreasing the chance of a chain explosion. The design of the munitions storage igloos remained the same until the mid-1950s. The design of the earth-covered magazines also changed in the period following the Korean War. Although the general design and the arched-roof structure of the igloos remained the same, wider openings with double-leaf steel doors began to be featured to facilitate the transportation of larger munitions. Older magazines were modified with the installation of access ramps and wider doors to allow the storage of heavier munitions. The most radical change in the igloo design took place in 1954, when the Chief of Ordnance recommended a new igloo design named "Stradley" after its designer. This design, which was also known as the yurt,

featured vertical side walls, an elliptical arch for the roof, and large sliding doors. The vertical walls of this design created additional storage space and allowed the munitions to be stacked vertically.

According to historic aerial photographs included in Appendix E-2 of the Final EIR, Igloos A1 to A9 were constructed between 1948 and 1953, and Igloos A10 to A14 were constructed between 1953 and 1962. In terms of their construction, all munitions storage igloos exhibit typical characteristics of the explosive magazines constructed during World War II between 1939 and 1945. While the WSA munitions storage igloos feature reinforced concrete constructions and barrel-arched bodies, they were constructed after the period of significance for this World War II weapons storage construction type and technique and, therefore, cannot be considered significant examples of the barrel-shaped igloos. (Appendix E-3)

The barrel-shaped igloo design was extensively used by the United States military in the construction of weapons storage facilities before it was replaced by "Stradley"-style magazines, which were extensively used in the 1950s. However, WSA igloos are not examples of "Stradley"-style magazines. (Appendix E-3)

Ammunitions storage igloos might be significant if they exhibit features reflecting the changes in ammunition storage as a result of the Cold War. Igloos A1 through A14, however, fail to show the stylistic and technical transition between the barrel-shaped igloos and "Stradley"-style igloos and, therefore, cannot be considered significant examples. (Appendix E-3)

Further, as detailed in Response O-7.9, above, the WSA igloos are not unique or distinctive examples of munitions storage igloos in California or the local region and are among the most common military-related weapons storage constructions. (Appendix E-3)

The analysis of the WSA igloos in terms of their style, construction, and type does not solely focus upon the "evolution" of the igloo styles, but rather mentions it as a part of the analysis and the technical study has been revised to reflect this. However, the WSA igloos also do not embody the distinctive characteristics of a type, period, or method of construction, as mentioned in the comment. The technical study included as Appendix E-2 of the Final EIR has been revised for clarification. (Appendix E-3) This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

O-7.13 This comment discusses the importance of Camp Haan. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), the Project site is located outside of and north of the boundaries of Camp Haan. Camp Haan is located both south and southeast of the Project site. The Project will not impact Camp Haan (see attached Figure O-7.13.1, Camp Haan Location). The comment further questions the Project's job generation. Please see Topical Response 5 – Jobs.

O-7.14 This comment asserts the Draft EIR defers mitigation for cultural resources. All necessary Phase II testing and evaluation have been completed to determine the potential presence of resources, as such no proposed mitigation is being deferred. As no CRHR-eligible or -designated cultural resources are located within the Project, no site-specific mitigation measures are warranted. However, the established conditions in the MMRP do include performance standards and processes to follow in the event that any inadvertent resources are discovered, steps for evaluating any inadvertent discovery, and guidelines regarding final deposition of any artifacts. The revised conditions are detailed in Section

4.4, Cultural Resources, of the Final EIR. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

O-7.15 This comment discusses additional studies that could be undertaken with regard to the bedrock milling features. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3) and detailed in Appendix E-1 of the Final EIR, Phase II testing has been conducted and the mitigation measures have been revised accordingly in the Final EIR. No interpolation of potential artifact quantities is warranted since testing throughout the APE failed to identify any archaeological artifacts or deposits.

Regarding pollen and protein residue analyses at bedrock milling sites, these studies rarely provide any information that is not anticipated. The results tend to reflect the processing of known plants and animals in the region and many studies are inconclusive due to impacts to the milling features, natural weathering and contamination. The studies are outside the accepted scope of any significance testing program and no special circumstances exist here warranting more in-depth analysis. When such studies were conducted at bedrock milling Site CA-RIV-1330/H, located approximately three miles south of the subject property, it did not provide any information that was unusual or not anticipated. These studies reflected plants that were known to have been used prehistorically, as well as plants that are associated with non-native species from agriculture and landscaping. Another similar study conducted at bedrock milling Site RIV-6506 found the sample was dominated by elongate forms with no interpretive data beyond representing the presence of grasses and possibly sedges. Further, cotton fibers were also present, indicating possible contamination. Due to the fact that prehistoric bedrock milling features such as those found within and surrounding the Project site are the most ubiquitous archaeological features found in the Riverside area, the lack of any recovered associated artifacts, and the sites' being not CRHR-eligible, the redundant or inconclusive data that may be obtained from pollen and protein residue analysis would not alter the evaluation of the sites. (Appendix E-3)

Finally, all archaeological work, including the potential for special studies, has been done in consultation with the Pechanga and Soboba Bands which do not seek pollen and protein residue analysis. (Appendix E-3)

O-7.16 This comment discusses historic and military uses at March ARB as well as the March Field Historic District. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), the March Field Historic District was approved for inclusion in the NRHP in 1994. However, the district, which is also referred to as the "historic triangle," is located approximately three miles southeast of the WSA, and the Project site is not within the March Field Historic District. The buildings located within the historic triangle were constructed in the mid- and late-1920s in the Mission Revival style. The significance of the historic district comes from its importance during World War II, its association with architect Myron Hunt, who established the Mission Revival Style for the base, and City Planner George B. Ford, who designed the base's distinctive triangular plan. No further effort was made to continue Mission Revival-style construction on the base after the 1920s. In fact, the architecture outside the historic triangle looks "strikingly similar" to other United States Air Force facilities constructed or expanded in the post-World War II period, which relied upon standardized architectural designs and diagrammatic floor plans. None of the WSA buildings are constructed in Mission Revival style, have any ties to World War II, or are associated with Myron Hunt or George B. Ford. The construction of the WSA buildings took place much later than the period of significance for the March Field Historic District. Additionally, they are geographically separate from the historic district . The

technical study, included as Appendix E-2 of the Final EIR, evaluated the WSA buildings, individually and collectively, and determined they did not qualify as historic resources.

Regarding tribal and archaeological resources, as detailed in Appendix E-1 of the Final EIR, Phase II testing has been completed to address the archaeological sites impacted by the Project individually and collectively. This information is incorporated into the Final EIR. None of the resources impacted by the Project are individually or collectively significant under CEQA. Prehistoric bedrock milling features such as those found within and surrounding the Project site are the most ubiquitous archaeological features found in the Riverside area due to the flat exposure of granitic bedrock common to the southern California batholiths. Further, the lack of any recovered associated artifacts or habitation debris firmly illustrates the prehistoric bedrock milling sites within the APE represent a location or landscape used only for the most expedient extraction of resources. (Appendix E-3)

While CEQA requires consideration of cumulative impacts of historic resources and prehistoric resources, combining analysis of prehistoric resources with the historic resources as a single site is not appropriate. There is no tangible connection between the two; rather, the historic land use of the property actually diminishes any potential integrity of some of the prehistoric sites. However, as no significant archaeological material was recovered from the Phase II testing, the prehistoric sites do not individually or collectively qualify as significant resources and, therefore, do not qualify for preservation as a site-specific mitigation measure. Regardless, as discussed above, through consultation between March JPA and the Pechanga and Soboba Bands, due to the cultural importance of such milling features, several methods of preservation/relocation of features are conditioned for the Project. Features clearly outside of the APE shall be preserved in place and attempts shall be made to preserve those within the APE but outside of the grading envelope. For features within areas of cut, an attempt shall be made to relocate (move) them to open space and those in areas of fill shall be attempted to be buried in place. Finally, the case referenced by the comment, Native American Heritage Commission v. County of Santa Clara, could not be located. (Appendix E-3)

O-7.17 This comment questions how grinding stones will be avoided during construction. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), Phase II testing of resources within the APE has been completed and no significant archaeological resources are located within the area of proposed Project construction. Although no archaeologically significant resources would be impacted by the Project, consultation between the Tribes, March JPA, and the Applicant has led to the development of revised conditions related to the prehistoric sites. The revised conditions are detailed in Section 4.4, Cultural Resources, of the Final EIR. These conditions primarily consist of efforts to either preserve in place or relocate (move) bedrock milling features, monitoring of ground-disturbing activities by an archaeologist and Native American observer, and controlled grading within the vicinity of any recorded site to ensure the timely and proper handling of any inadvertent finds. Further, the locations of archaeological resources, including bedrock milling features, whether in-situ or relocated, are protected from disclosure to the public. Consultation with both the Pechanga and Soboba Bands on similar projects has led to requests from both groups to make the locations of any features remain confidential, whether significant under CEQA or not. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

O-7.18 This comment asserts the buildings and igloos could potentially be reused in alternatives suggested by the community. In response, please see Topical Response 8 – Alternatives.

O-7.19 This comment requests consideration of protecting the Project site in its undeveloped state. The comment does not raise any specific issues or questions about the adequacy of the environmental analysis included in the Draft EIR.

O-7.20 This comment questions how grading will be monitored to assure that paleontological resources would not be impacted. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), and described in Section 4.6, Geology and Soils, as well as Section VI of the Project Paleontological Assessment (Appendix H of the Final EIR), research has confirmed the existence of potentially fossiliferous Pleistocene very old alluvial fan deposits mapped at the eastern end of the Project. Approximately 1.18 acres of mapped deposits have the potential to be disturbed by the Project ("Qvofa" on the Figure below).

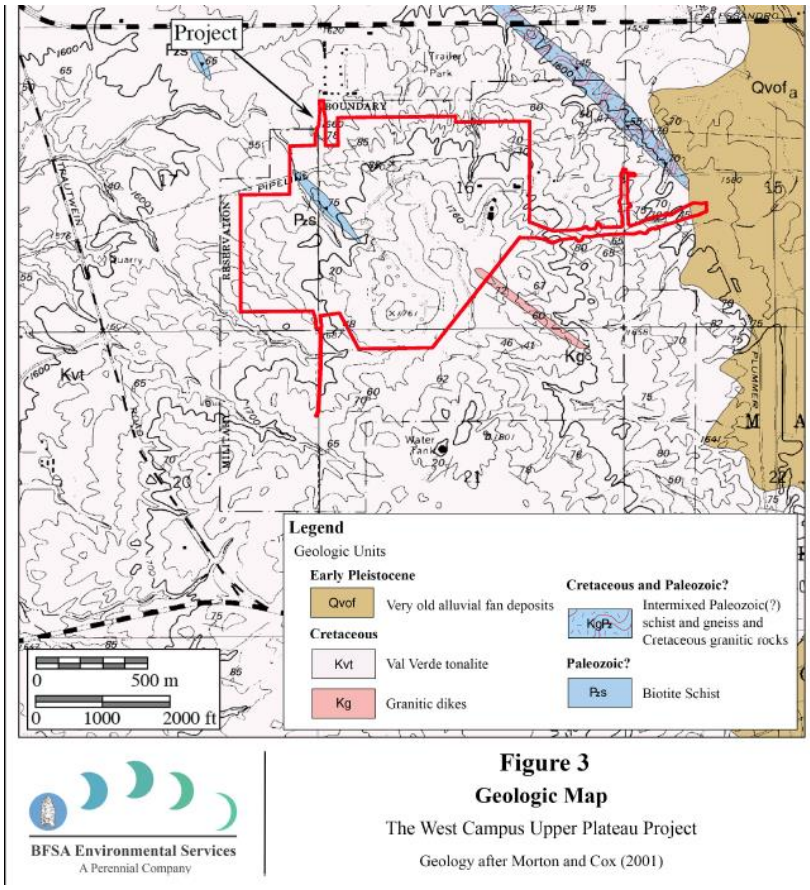


Figure 3
Geologic Map
The West Campus Upper Plateau Project
Geology after Morton and Cox (2001)

As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), although the paleontological locality search did not indicate the presence of any known fossil localities within the Project site or surrounding area, the occurrence of terrestrial vertebrate fossils at shallow depths from Pleistocene older alluvial fan sediments across the Inland Empire of western Riverside County is well-documented. These Pleistocene older alluvial fan sediments are typically assigned a "High" paleontological sensitivity rating for yielding paleontological resources. Full-time monitoring of undisturbed Pleistocene old alluvial fan deposits at the Project is recommended starting at the surface. Monitoring is not warranted for outcrops or exposures of tonalite and other crystalline rocks composing the majority of the Project. As detailed in Section 4.6, Geology and Soils, of the Final EIR, MM-GEO-2 has been revised to reflect the recommended Paleontological Resource Impact Mitigation Program

(PRIMP) covering the approximately 1.18 acres of Pleistocene alluvial fan deposits proposed for development for approval by March JPA before the issuance of the grading permit. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

O-7.21 This comment questions how paleontological resources would be handled. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), three museums with significant paleontological resource holdings from localities throughout southern California were consulted to demonstrate the potential presence of any fossil localities that may lie within or near the Project. Their findings are attached in Appendix B of the Paleontological Resources Assessment (Appendix H to the EIR) and are summarized in Section IV of the revised Paleontological Resources Assessment. As stated in the "Fossil Locality Search" segment of Section IV, the nearest-known fossil locality is eight miles east of the Project site from Pleistocene-aged alluvial deposits. Alluvial fan deposits of a similar age are present within approximately 1.18 acres proposed for development at the eastern end of the Project, which have a high potential to yield significant paleontological resources. (Appendix H) Accordingly, the report, as well as the analysis in Section 4.6, Geology and Soils, of the Final EIR, addresses the potential for adverse impacts to the paleontological resources that these deposits may contain at the Project. The remainder of the Project (i.e., west of the Pleistocene alluvial fan deposits as mapped in the Figure in Response O-7.20, above) is geologically mapped as tonalite, which possesses minor granite and metamorphic rock inclusions. Tonalite, granite, and these metamorphic rocks do not yield fossils. Tonalite and granite are categorized within the granitic suite of plutonic rocks, having crystalized several miles below the earth's surface from a molten state, and were subsequently uplifted to the surface via the action of plate tectonics. As such, fossils do not exist in tonalite and granite. The metamorphic rocks within the Project site were probably previously sedimentary rocks that were subsequently subject to such intensive heat and pressure during subduction and exhumation that they physically altered to an interlocking, crystalline state. As such, fossils do not exist in these metamorphic rocks. Therefore, the potential for adverse impacts to paleontological resources in these rocks does not exist and monitoring for paleontological resources is not recommended in areas mapped as tonalite, granite, or any metamorphic rocks as shown in the Figure in Response O-7.20, above. Finally, San Timoteo Canyon lies several miles to the north within a different geologic setting than that of the project, and contains different, unrelated geologic formations. Therefore, a paleontological comparison between the two sites is not appropriate.

MM-GEO-2 has been revised in Section 4.6, Geology and Soils, of the Final EIR. With implementation of the revised MM-GEO-2, the Project's impacts to paleontological resources would remain less than significant. (Appendix E-3) This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

O-7.22 This comment raises concerns regarding enforcement of the monitoring and mitigation of paleontological resources. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), MM-GEO-2 (see Section 4.6, Geology and Soils, of the Final EIR) has been revised to better clarify the role of the qualified professional paleontologist, the extent of monitoring, and the required measures in the PRIMP. Approximately 1.18 acres of Pleistocene alluvial fan deposits proposed for development, plus a 100-foot buffer, will be demarcated, both on grading plans and in the field, by a qualified geologist. The PRIMP will follow the guidelines and recommendations of March JPA and Society of Vertebrate Paleontology and must be drafted by a qualified professional paleontologist with a master's or doctorate degree in paleontology or geology who is knowledgeable in professional paleontological procedures and

techniques. The qualified paleontologist will attend the preconstruction meeting to consult with the grading and excavation contractors and will direct the paleontological monitoring program. Fieldwork may be conducted by a qualified paleontological monitor, defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall always work under the direction of a qualified professional paleontologist.

Full-time monitoring of grading or excavation activities will be performed starting at the surface in undisturbed areas of Pleistocene sedimentary deposits. The paleontological monitor will be present on-site to inspect for paleontological resources during the excavation of previously undisturbed deposits. The monitor will be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. (Appendix E-3)

The PRIMP will include methods for salvage and recovery, preparation, sorting and cataloging, and donation of paleontological resources. Upon completion, the qualified paleontologist will prepare a final monitoring and mitigation report of findings and significance to March JPA for approval. (Appendix E-3)

With regard to potential bias, the qualified professional paleontologist will be subject to the mandatory and aspirational standards of the Society of Vertebrate Paleontology Ethics Code, which addresses scientific misconduct, fossil collection, collections management, working with specimens, and paleontological research. (Appendix E-3)

O-7.23 This comment questions how monitoring for paleontological resources would occur with blasting activities during construction. As explained in the BFSA Cultural Resources Responses to Comments (Appendix E-3), as set forth in the revised MM-GEO-2 (see Section 4.6, Geology and Soils, of the Final EIR), prior to grading, the professional paleontologist shall demarcate, both on the grading plans and in the field, the extent of the Pleistocene very old alluvial fan deposits within the area of ground disturbance in the Project site. Blasting within demarcated areas shall not occur until after the completion of paleontological monitoring, or at the discretion of the professional paleontologist. In the event conditions arise that would require blasting within the demarcated area, the Applicant shall utilize alternative rock breaking methods, such as expanding chemical agents (epoxy resin).

O-7.24 This comment describes a 2017 case of Jamul Action Committee v. Chaudhuri, and alleges it held a proposed casino project would have a cumulative impact on the Jamul Indian Village and the adjacent Camp Lockett under CEQA. A case as described by the comment could not be located. There was a federal district court case, Jamul Action Committee v. Chaudhuri (2016) 200 F.Supp.3d 1042, but that case held NEPA did not apply; CEQA was not discussed at all. Additionally, Camp Lockett, located in Campo, California, is 30 miles away from the disputed casino project. While CEQA requires consideration of cumulative impacts of historic resources and prehistoric resources, combining analysis of prehistoric resources with the historic resources as a single site is not appropriate as they are not interconnected. Please see Response O-7.16, above.

O-7.25 This comment discusses NEPA and the requirement that federal agencies analyze alternatives prior to making decisions that would affect the environment. The Project is not being undertaken by a federal agency, and as such, the Project is not subject to NEPA. However, when the United States Air Force was

completing realignment of the base prior to the formation of March Joint Powers Authority, an EIS evaluating alternatives for the disposition of this land, was prepared in compliance with NEPA.

O-7.26 This comment is a conclusion statement and does not raise any specific issues or questions about the adequacy of the environmental analysis included in the Draft EIR.

O-7.27 This comment states that a review under NEPA should be completed. As discussed in Response O-7.25 above, NEPA is not applicable to the Project.

O-7.28 This comment requests the inclusion of a historic resources review process under NHPA. As discussed in Response O-7.16 above, a combined analysis of the tribal cultural resources and WSA is not appropriate.

O-7.29 This comment expresses support for preserving military sites. The comment does not raise any specific issues or questions about the adequacy of the environmental analysis included in the Draft EIR.

Comment Letter O-8

SHUTE, MIHALY & WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

TORI BALLIF GIBBONS
Attorney
gibbons@smwlaw.com

March 10, 2023

Via E-Mail Only

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA, 92518
fairbanks@marchjpa.com

O-8.1

Re: Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304.

Dear Mr. Fairbanks:

On behalf of the Riverside Neighbors Opposing Warehouses ("R-NOW"), we have reviewed the Draft Environmental Impact Report ("DEIR") prepared in connection with the proposed West Campus Upper Plateau Project ("Project"). R-NOW has serious concerns about the environmental impacts of the Project as currently proposed. As discussed in more detail below, the DEIR fails to provide a stable project description and substantially understates, and fails to fully analyze, the severity and extent of significant project-related effects on air quality, greenhouse gas ("GHG") emissions, and public health. The DEIR also fails to consider alternatives that could lessen these impacts. The environmental documentation for the Project is thus inadequate as an informational document and violates the minimum standards of adequacy under the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 et seq., and the CEQA "Guidelines," California Code of Regulations, title 14, § 15000 et seq.

O-8.2

Referenced throughout these comments is an air quality letter report prepared by Baseline Environmental Consulting ("Baseline Report"), which is attached as Appendix A and is incorporated herein by reference. Please refer to this report for further detail and discussion of the DEIR's inadequacies regarding impacts on hazardous materials, air pollution and related health risks. We request that the March Joint Powers Authority ("JPA") respond to both the comments in this letter and to each of the comments in the Baseline Report.

I. Introduction and Background

In 1993, the federal government initiated the process of realigning the March Air Force Base toward civilian use. To facilitate this effort, the Cities of Moreno Valley, Perris, and Riverside, and the County of Riverside formed the March JPA, which serves as the lead agency for the Project's CEQA review. In 1999, the March JPA approved a General Plan for the March JPA planning area. Under that General Plan, the Project developable area is currently designated as Business Park ("BP"), and Park/Recreation/Open Space ("P/R/OS"); Industrial designations in the site area are all located east of Brown St.

The General Plan and other redevelopment documents contemplate "economic reuse of the former base area, preservation of existing resources, and maximizing orderly growth and development." March General Plan at 1-4 to 1-5. These planning documents suggest that "economic growth and development" be undertaken in a balanced way that "enhanc[es] the quality of life in the region." *Id.* Over the last 30 years, redevelopment of the March Air Force Base has generally taken place in a piecemeal fashion, with the planning area roughly divided into the Main Base or Northeast Planning Subarea (part of the former main base), the West March Planning Subarea (property west of Interstate 215), and the Southeast Planning Subarea (adjacent to aviation field cantonment area). Up to this point, the West March Planning Subarea has remained mostly undeveloped and is bound on three sides by residential neighborhoods. 0-8.3

On February 24, 2022, applicant Meridian Park West LLC hosted a community meeting on Zoom to discuss the proposed Project. Many community members had only become aware of the proposed Project after receiving a flier in the mail days before the meeting. Upon hearing the details of the Project and the potential proximity of dangerous warehouse development to sensitive neighborhoods, many residents banded together to form Riverside Neighbors Opposing Warehouses ("R-NOW") to express their strong opposition to the Project.

Over the next several months, members of R-NOW met with the applicant and March JPA staff to express their concerns about industrial development on the site. Because warehousing would be inappropriate and harmful in light of the surrounding neighborhoods, R-NOW urged the March JPA to consider alternate uses for the property, including educational institution campus, housing and medical services for veterans, office park, and open space/park. R-NOW also submitted a petition with over 2,000 signatures from residents opposed to warehouse development in the West Campus Upper Plateau. Over 100 residents attended the applicant's August 18, 2022 community engagement meeting to communicate their opposition to the Project as proposed. R-NOW even asked for the formation of a community advisory group that would provide valuable 0-8.4

public input and help the JPA consider non-industrial alternatives for the site. The JPA declined this request, citing its sunsetting in July 2025 as an excuse.

Throughout this period, R-NOW and members of the public encountered troubling actions and attitudes from the applicant, their elected representatives, and even the JPA. For instance, in October, the JPA quietly amended its development agreement with the applicant to set up a payment schedule that more strongly incentivizes certain types of development. The JPA also planned to consider a proposal to partially reassign Meridian Park West's interests in the development agreement to a subsidiary company, but have postponed the vote on that action until after the public comment period.

0-8.4 Cont.

Despite the lack of responsiveness from the agency and applicant thus far, R-NOW's concerns are well-founded. As numerous articles have discussed in recent months, California's Inland Empire—which includes the Project site—is already host to more than 4,000 warehouses and roughly 600,000 daily truck trips that produce 50 million pounds of carbon dioxide.[1] See also, Appendix B, Articles regarding impacts from growth of warehouse industry in California. These existing warehouses already have devastating human health and climate change impacts on the region, and the JPA should avoid any development that would exacerbate the issue—especially in the name of short term warehouse jobs that might be replaced by future automation.

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Here, the proposed Project would implement construction and operation of 3,062,561 square feet of industrial warehouse uses, 1,280,403 square feet of business park warehouse uses, and 482,765 square feet mixed-use warehouse uses, for a total of 4,825,729 square feet of warehouse uses. DEIR Table 4.15-1 at 4.15-6 and 4.15-7. The Project has 384,121 square feet of estimated office space for the business park and 144,830 square feet allocated for retail mixed-use. The Project allocates more than a thousand auto parking spaces and truck/trailer parking spaces, and construction of related infrastructure on an approximately 369-acre site. DEIR at 1-4, 1-5, 3-8, and 3-9. This additional warehouse development will only serve to worsen climate change and human

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[1] *See* "California warehouse boom comes with health, environmental costs for Inland Empire residents," J. Newton, *Cal Matters*, Jan. 26, 2023, available at https://calmatters.org/commentary/2023/01/inland-empire-california-warehouse-development/; "Warehouse boom transformed Inland Empire. Are jobs worth the environmental degradation?" *Los Angeles Times*, Feb. 5, 2023, available at https://www.latimes.com/california/story/2023-02-05/warehouses-big-rigs-fill-inland-empire-streets; "Inland Empire residents are fighting warehouse sprawl," R. Fonseca, *Los Angeles Times*, Feb. 7, 2023, available at https://www.latimes.com/california/newsletter/2023-02-07/essential-california-warehouses-inland-empire-essential-california.

0-8.7

health impacts for the region, and especially for the communities closest to the Project. For the reasons set forth below, it is our opinion that the DEIR does not comply with the requirements of CEQA. The DEIR fails to adequately analyze or effectively mitigate the Project's significant impacts or to consider an adequate range of alternatives that includes a warehouse-free version of the Project. These shortcomings will directly and significantly impact residents immediately adjacent to the project.

O-8.7 Cont.

II. The DEIR's Flawed Description of the Existing Setting and the Project Does Not Permit Meaningful Public Review of the Project.

A. Project Setting

Accurate and complete information pertaining to the setting of the project and surrounding uses is critical to an evaluation of a project's impact on the environment. *San Joaquin Raptor/Wildlife Center v. Stanislaus County*, 27 Cal.App.4th 713, 728 (1994); see also *Friends of the Eel River v. Sonoma County Water Agency*, 108 Cal.App.4th 859, 875 (2003) (incomplete description of the Project's environmental setting fails to set the stage for a discussion of significant effects). Here, the DEIR's deficiencies in describing the Project's setting undermine its adequacy as an informational document.

The environmental setting discussion in the DEIR omits essential information about the existing conditions in the area and thus fails to meet CEQA's requirements. For example, the DEIR fails to present important contextual information related to the number of existing warehouse facilities in the area. As shown in the attached map (Appendix C), other existing warehouses in the area include:

O-8.8

A) City of Riverside Sycamore Canyon – 53 buildings totaling approximately 680 acres or 16,200,000 square feet of warehouse uses.

B) March JPA North Campus – Meridian – 33 buildings totaling approximately 530 acres or 12,600,000 square feet of warehouse uses.

C) March JPA South Campus – Van Buren – 9 buildings totaling approximately 249 acres or 6,000,000 square feet of warehouse uses.

D) Moreno Valley - Alessandro Boulevard & Cactus Avenue - 25 buildings totaling approximately 350 acres or 8,300,000 square feet of warehouse uses.

E) Perris, Moreno Valley - Heacock, and Mead Valley – 148 buildings totaling approximately 2908 acres 70,000,000 square feet of warehouse uses.

Together these existing facilities result in thousands of truck trips, massive quantities of air emissions, and substantial truck traffic noise. Neighborhoods in the area are already overburdened with impacts from these facilities. Moreover, as acknowledged in the DEIR and discussed in more detail below, the region is designated as a nonattainment area for federal and state ozone standards, state particulate matter (PM_{10}) standards and a nonattainment area for state and federal $PM_{2.5}$ standards. In addition the area is a nonattainment area for state Nitrogen Dioxide (NO_2) standards, which the DEIR fails to acknowledge. The DEIR must take these existing conditions into account before evaluating the additional impacts of the proposed project.

0-8.8 Cont.

In order for the public and decision-makers to be able to fully understand the environmental impacts of this Project, more information about the Project setting is needed. Such information includes, but is not limited to, a detailed description of the following:

- Existing transportation infrastructure around the Project site, including the existing accident rates on roadways and availability of public transportation.
- The existing hydrological and hydraulic conditions of drainages in the vicinity of the Project.
- Properly documented noise levels existing at and around the Project site.
- Cumulative projects, including major construction projects, that will be carried out in the area during the period when the Project will be under construction.
- Any other relevant regional and local setting information (e.g., number and type of warehouse facilities and proximity to the site) necessary to evaluate project and cumulative impacts.

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Given the inadequacies of the Project setting and description, however, decisionmakers and members of the public would not be made aware of the threat to important environmental, aesthetic, and community values.

B. Project Description

In order for an EIR to adequately evaluate the environmental ramifications of a project, it must first provide a comprehensive description of the project itself. "An accurate, stable and finite project description is the *sine qua non* of an informative and

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legally sufficient EIR." *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal. App. 4th 713, 730 (quoting *County of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 193). As a result, courts have found that even if an EIR is adequate in all other respects, the use of a "truncated project concept" violates CEQA and mandates the conclusion that the lead agency did not proceed in the manner required by law. *San Joaquin Raptor*, 27 Cal. App. 4th at 729–30. Furthermore, "[a]n accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." *Id*. at 730 (citation omitted). Thus, an inaccurate or incomplete project description renders the analysis of significant environmental impacts inherently unreliable. The court in *Inyo II* explained why a thorough project description is necessary:

> "A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance."

Id. at 192-93.

Here, the DEIR's Project Description does not come close to meeting these established legal standards. The DEIR's approach to the Project description makes environmental review difficult, if not impossible. Indeed, the Project is so thinly described that it appears to be essentially unplanned, and certainly is not ready for the approvals that the Applicant is requesting. Any reasonably complete description of the Project would give the public and decision makers a sense of what the planned development would look like, how it would operate, and how it would mesh with the surrounding uses. For example, as discussed below, a revised DEIR should include building design and specifications, construction details including an erosion control plan and a drainage plan, details of planned landscaping and lighting, and information about the location and number of public trails. The DEIR provides no such information. This failure echoes throughout the DEIR; because the Project is incompletely described, none of its impacts can be fully analyzed.

0-8.10 Cont.

The DEIR fails to describe aspects of the Project critical to its analysis. In perhaps the most glaring example, the public has yet to be informed regarding the contents of the proposed Development Agreement 21-01, but this Agreement will vest certain specific rights and entitlements with the developer, should the JPA approve the Project as proposed. DEIR at 1-15. Regardless of the specifics, once a development agreement is

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approved, a public agency "shall not prevent development of the land for the uses and to the density or intensity of development set forth in the agreement," even if the project requires further discretionary approvals. Gov. Code § 65865.2; see also *Citizens for Responsible Government v. City of Albany* (1997) 56 Cal.App.4th 1199, 1214-15 (development agreement creates vested rights in the form of an "entitlement for use"). If the agency breaches a development agreement, it may be subject to damages. See *Mammoth Lakes Land Acquisition, LLC v. Town of Mammoth Lakes* (2010) 191 Cal.App.4th 435, 443-47, 476 (developer awarded $30 million for town's anticipatory breach of development agreement). Given the importance of these documents, the JPA must release this information to the public and provide additional time for review and comment. Pub. Res. Code § 21092(b)(1). Without an opportunity to review the new Development Agreement 21-01 proposed specifically for this Project, the public and decision makers are in the dark about what it may contain. This is especially true given that the DEIR describes Development Agreement 21-01 as "providing certain Community Benefits including compliance with the terms of the CBD Settlement Agreement…and provision of new public benefits, including, but not limited to, expansion of employment opportunities for area residents." DEIR at 1-15. To fully evaluate the Project, the public and decision makers must understand what this Agreement entails.

0-8.11 Cont.

The Development Agreement would substantially increase the amount of allowed industrial development on the site. DEIR at Figure 3-2. As discussed throughout this letter, and in letters from other community and environmental groups, this substantial increase in industrial uses will result in significant impacts with regional implications. Therefore, the JPA should release a draft of the Development Agreement for public review.

The DEIR further states that Development Agreement 21-01 will be "between March JPA and Meridian Par LL with a 15-year term and two potential 5-year extensions." *Id.* R-NOW questions the JPA's ability to enter a new Development Agreement in light of the fact that it will be sunsetting in 2025 and will transfer its land use authority to the County of Riverside. *See* DEIR at 4.2-15, 4.5-9, and 4.7-27 (all referencing the 2025 sunsetting and transfer of land use authority without further discussion). The DEIR's failure to explain or analyze how this transfer of land use authority will impact the agreements and entitlements necessary for the Project further demonstrates the inadequacy of the Project description. The public is left in the dark as to how land use supervision of the Project would play out.

In addition, the DEIR defers plans and specifications related to building design. For example, the DEIR states that plans and specifications for features that are relied upon to reduce air emissions will be prepared *after* project approval. *See* DEIR at 1-20. In

0-8.12

another example, the DEIR defers preparation of a Soil Stabilization Plan. DEIR at 1-61. This plan would include measures to prevent soil erosion during construction. *Id*. Yet, the DEIR includes only a laundry list of potential soil stabilizing measures with no clear commitment to implement any of them. Likewise, the DEIR defers preparation of a Construction Traffic Management Plan addressing construction period traffic detours and other disruptions and fails to include the Barton Street Traffic Safety Plan. DEIR at 1-70. Similarly, the DEIR fails to include either a Hydrology/Drainage Report or a Water Quality Management Plan. DEIR at 1-62 to 1-64. The result is a document that fails to adequately describe the Project or how it will operate during both construction and operational phases.

0-8.12 Cont.

In addition, the EIR also fails to include information on the following additional Project components:

- information on construction phasing and schedule;
- location of the Project construction staging areas;
- location of proposed blasting activities (DEIR at 1-7 and 1-9);
- operating hours of warehouse facilities;
- location and number of public trails;
- location and number of fences;
- landscaping plan;
- lighting plan.

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This information is important to disclose because these features will result in visual, noise, air quality, and public safety impacts to area residents. Yet, the DEIR omits details regarding the locations of these activities and project elements.

The proposed Project would undoubtedly result in additional potentially significant environmental impacts that the DEIR ignores. These include, but are not limited to, greenhouse gas emissions, soil erosion, traffic congestion and public safety impacts, and hydrology and water quality impacts. The potential development and related impacts must be disclosed and analyzed now, during this CEQA process. Given the site's location, surrounding by residential neighborhoods on three sides, this gap in the project description is especially unacceptable.

In sum, the DEIR fails to adequately describe the existing setting and presents an unstable and inadequate project description, made further unstable by undisclosed project details that may be contained in the Development Agreement. This approach is not permissible under CEQA. The failure to describe the whole of the Project is a serious and pervasive deficiency, as it renders faulty the EIR's environmental impact analyses as well as the discussion of potential mitigation measures and alternatives to minimize those

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impacts. The EIR must provide a sufficient description of the existing conditions, proposed construction activities and schedule, operational activities, and any other Project details. This information is necessary to allow decision makers, the public and responsible agencies to evaluate potential environmental impacts.

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III. The DEIR Fails to Adequately Analyze and Mitigate the Project's Air Quality and Climate Change Impacts.

In evaluating the Project's air quality impacts, the regional air quality baseline is key. Air pollution from significant activities in the South Coast Air Basin (Basin) includes a variety of industrial-based sources as well as on- and off-road mobile sources. These sources, coupled with geographical and meteorological conditions unique to the area, stimulate the formation of unhealthy air. The Basin is designated as a nonattainment area for state PM_{10} standards. In regard to $PM_{2.5}$ attainment status, the Basin is designated as a nonattainment area by both the California Air Resources Board (CARB) and EPA. *See* DEIR at 4.2-4. Breathing in particulate matter (PM_{10} and $PM_{2.5}$) and ground-level ozone can trigger a variety of health problems. The Basin is also designated as nonattainment for ozone by both the CARB and EPA.[2] Finally, CARB has designated portions of the Inland Empire near State-route 60 as nonattainment for nitrogen dioxide NO_2.[3]

One of the unique and consequential aspects of warehouse uses is the reliance on heavy-duty trucks for transportation of goods and materials to and from the facilities. Heavy-duty trucks are key sources of diesel pollution and toxic air contaminants (TACs) and are therefore a key contributor to air quality impacts. Diesel trucks emit large volumes of particulate matter (a.k.a. diesel particulate matter, or DPM) and oxides of nitrogen (NO_x), thereby contributing to health problems that include cardiovascular issues, cancer, asthma, decreased lung function and capacity, reproductive health problems, and premature death.[4] Diesel generators are another source of DPM and NO_x, and as explained below, these are not clearly quantified in the emissions calculations.

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Indeed, the DEIR's analysis of Project-related air quality impacts contains deficiencies that must be remedied in order for the public and decision-makers to fully

[2] https://ww2.arb.ca.gov/sites/default/files/2022-12/Jan_2023_SC_CV_70ppb_Staff_Report.pdf
[3] https://ww2.arb.ca.gov/sites/default/files/2022-12/no2.pdf
[4] Storing Harm: the Health and Community Impacts of Goods Movement Warehousing and Logistics, January 2012, available at: https://envhealthcenters.usc.edu/wp-content/uploads/2016/11/Storing-Harm.pdf; accessed June 2, 2021.

understand the Project's impacts. Furthermore, the DEIR fails to identify all feasible mitigation that could be incorporated to minimize the impacts of the Project.

0-8.15 Cont.

A. The DEIR Does Not Identify All Sources of Toxic Air Contaminants.

While the DEIR assumed the use of diesel generators during construction and accounted for those emissions in the analysis, the DEIR makes no reference to the existence of diesel generators (back-up or otherwise) in the day-to-day operations of the future warehouse facilities. Diesel generators are a fairly typical piece of equipment at warehouse facilities. If diesel generators were intentionally not included in the operations emissions calculations, it should be noted and there should be a requirement prohibiting their use at any facility in the Specific Plan area and the means to ensure compliance should be detailed. If diesel generators are not going to be prohibited, their omission from the emissions calculations is a substantive oversight which renders the emissions calculations inaccurate and the conclusions of the Health Risk Assessment (HRA) incorrect as well.

B. The DEIR Does Not Identify the Extent and Severity of Air Quality and Greenhouse Gas Emissions Impacts *Before* Mitigation.

In numerous instances, the DEIR determines that the Project may have significant impacts, but then fails to describe the extent and severity of those impacts *prior* to implementation of measures designed to reduce the impact. For example, the DEIR indicates that the Project could expose sensitive receptors to substantial pollutant concentrations and a HRA was completed. *See* DEIR at 4.2-32. The HRA determined that the residential land use with the greatest potential exposure to Specific Plan Area operational-source DPM emissions is an existing residence at 20620 Iris Canyon Road. The DEIR asserts that with the application of Project Design Feature PDF-AQ-2 (the requirement for all-electric cargo-handling equipment), the maximum incremental cancer risk attributable to the Project at this location would not exceed SCAQMD's significance threshold and the impact would therefore be less than significant. *Id*. The HRA also assumed the inclusion of PDF-AQ-2 for the analysis of the incremental cancer risk from DPM for preschool students at Grove Community Church, which resulted in a less than significant conclusion. *See* DEIR at 4.2-33.

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These conclusions cannot stand for two reasons. First, under CEQA, when evaluating the significance of a project's impacts, an EIR may not "compress[] the analysis of impacts and mitigation measures into a single issue." *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656. By assuming the implementation of Project design features as part of the Project, the EIR here did just that. The DEIR's failure to evaluate the health impacts of DPM emissions in the area with greatest potential

exposure prior to mitigation violates CEQA. And in so doing, it failed to recognize the Project's potential to result in significant air quality impacts to sensitive receptors. Without an accurate significance finding, the DEIR cannot adequately identify mitigation for the impact. As in *Lotus*, the EIR's failure to evaluate the significance of the Project's impacts separately from what is effectively its proposed mitigation (implementation of project design features) results in a flawed analysis.

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More specifically, by conflating impacts and mitigation, the EIR fails to consider whether there may be other, more effective mitigation options, thereby omitting information necessary for the informed decision-making and public participation that CEQA requires. *See id*. at 658; *see also San Franciscans for Reasonable Growth v. City & County of San Francisco* (1984) 151 Cal.App.3d 61, 79 (EIR is inadequate if it fails to identify feasible mitigation measures). Further, a finding of significance is required to trigger the agency's obligation to include enforceable mitigation, as well as a monitoring program. When an EIR relies on project design features as de facto mitigation, this crucial part of the CEQA process is unlawfully omitted. *See Lotus*, 223 Cal.App.4th at 656-57.

C. The Mitigation Measures Identified to Reduce Air Quality and Greenhouse Gas Emissions Impacts Are Insufficient.

The DEIR's evaluation of potential mitigation measures is equally flawed. A basic purpose of CEQA is to "[P]revent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible." (State CEQA Guidelines § 15002(a)(3))

Even with the mitigation measures included in this DEIR, significant and unavoidable impacts remain. However, that does not allow the DEIR or the JPA to simply conclude that nothing else can be done. CEQA mandates that an agency adopt the most effective and feasible measures to reduce a project's impacts, even if they do not reduce the impacts to a less than significant level. *See* Pub. Res. Code § 21002 (CEQA mitigation includes measures that would "*substantially lessen* the significant environmental effects" of a project); *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-25 ("Even when a project's benefits outweigh its unmitigated effects, agencies are still required to implement *all* mitigation measures unless those measures are truly infeasible.") (emphasis added). The DEIR's proposed mitigation measures for the Project's air quality and greenhouse gas impacts fall far short of CEQA's requirements.

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There are examples up and down the State of California of warehouse/fulfillment center projects that have been approved and constructed with feasible, effective, and

robust measures designed to minimize the impacts of greenhouse gas emissions, reduce the effects of particulate matter and air quality degradation, and increase transportation and energy efficiency. Listed below are examples of recent projects that were approved with such measures in place; their approval documents with the measures to be implemented are included as appendices to this letter:

- World Logistics Center: Buildings totaling 40.6MSF on 2,610 acres in the City of Moreno Valley. Approved June 16, 2020. *See* WLC Settlement Agreement attached as Appendix D.

- CenterPoint Properties Warehouse Project: Buildings totaling approximately 555,537 square feet on a 31.48-acre site in the unincorporated North Richmond area of Contra Costa County. Approved May 2022. *See* CenterPoint Properties Warehouse Project Conditions of Approval attached as Appendix E.

- Mariposa Industrial Park: Buildings totaling approximately 3.6MSF on 203 acres in the unincorporated Stockton area of San Joaquin County. Approved December 2022. *See* Mariposa Industrial Park Project Mitigation Monitoring and Reporting Program attached as Appendix F.

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In addition to the project-specific measures contained in each of the approval documents cited above, other municipalities such as the City of Fontana have adopted citywide ordinances that mandate the inclusion of many of these measures in every warehouse/fulfillment center project over a certain size. See Fontana Ordinance 1891 attached as Appendix G.

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With plentiful examples of effective, reasonable, and feasible warehouse project mitigation, the Project DEIR must be revised to include more robust measures with requirements for: (1) context-sensitive site design and facility layout; (2) measures to reduce impacts during facility construction; and (3) measures to reduce impacts during ongoing facility operation. The measures below address issues such as energy efficiency, emissions reduction, particulate matter reduction, and minimizing vehicle miles traveled (which reduces air emissions). In addition to the actions required by Project Design Features PDF-AQ-1 through PDF-AQ-4, Mitigation Measures AQ-1 through AQ-15, and Mitigation Measures GHG-1 through GHG-11, the following additional measures should be incorporated into this DEIR to further reduce air quality impacts:

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MINIMIZING CONSTRUCTION IMPACTS

- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Requiring on-road heavy-duty haul trucks to be model year 2014 or newer if diesel-fueled.
- Providing electrical hook ups rather than use of diesel-fueled generators, for electric construction tools and equipment.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than two minutes.
- Keeping onsite, and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite for construction employees to minimize travel during meal breaks.

MINIMIZING ONGOING OPERATIONAL IMPACTS

- Requiring that all facility-owned and operated fleet equipment to meet or exceed 2014 model-year emissions equivalent engine standards and requiring documentation of compliance.
- Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
- Requiring all on-site, service yard equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.

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Cont.

- Requiring truck operators to turn off engines when not in use.

- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.

- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of the facility for the life of the project.

- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.

- Constructing electric truck charging stations proportional to the number of dock doors at the project. O-8.19 Cont.

- Constructing electric plugs for electric transport refrigeration units (TRUs) at every dock door for facilities with cold storage and prohibiting diesel power for TRUs.

- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.

- Installing solar photovoltaic systems on the project site equal to the building's projected energy needs plus providing power to all electric vehicle charging stations. Mitigation Measure GHG-1 requiring PV generation to supply 30% of building energy needs is insufficient.

- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.

- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

- Requiring facility operators to establish and promote a rideshare program for employees that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.

- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. Mitigation Measure GHG-7 requiring circuitry for a minimum of 20 electric vehicle parking stations is inadequate.

- Achieving certification of compliance with LEED green building standards.

- Providing employee meal options onsite or shuttles between the facility and nearby meal destinations.

- Improving and maintaining vegetation and tree canopy for residents in and around the project area.

- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.

O-8.19 Cont.

- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants to use carriers that are SmartWay carriers. Mitigation Measure GHG-10 should be updated.

- Installing signs in residential areas noting that truck and employee parking is prohibited.

- Consulting with the local public transit agency and securing increased public transit service to the project area.

- Designating areas for employee pickup and drop-off.

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.

The JPA should also consider the possibility of a mitigation fund. For instance, The World Logistics Center project in Moreno Valley was required to create a fund to mitigate project impacts on affected residents, schools, places of worship, and other community institutions by retrofitting buildings on their properties. The fund was used to retain a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains on properties impacted by the project. Additionally, since the County of Riverside will be enforcing all operational and most construction phase requirements, all project requirements should meet or exceed County of Riverside standards to avoid conflicts. 0-8.20

In sum, the March JPA must identify effective, enforceable measures that will minimize impacts to the community. The March JPA cannot approve the Project unless it analyzes and adopts Project alternatives or mitigation measures that meet this standard. *See* Guidelines § 15002(a); *see also* Pub. Resources Code § 21002; Guidelines §§ 15002(a)(3), 15021(a)(2); *Citizens for Quality Growth v. City of Mount Shasta* (1988) 198 Cal.App.3d 433, 443-45. Appendices D through F contain detailed mitigation measures that should be thoroughly considered and adopted, if feasible, to ensure that all reasonable and feasible measures are implemented to reduce the Project's significant impacts. 0-8.21

IV. The DEIR Fails to Fully Disclose and Mitigate the Project's Public Health Impacts to Sensitive Receptors.

A. The DEIR Fails to Fully Disclose Existing Conditions and the Project's Potential for the Release of Hazardous Materials Into the Environment.

The DEIR fails to evaluate the environmental impacts of the Project in context. Guidelines, § 15064(b). As discussed above, the Project site is located in an area designated as a "Disadvantaged Community." Disadvantaged communities are defined by the State Office of Environmental Health Hazard Assessment (OEHHA) as being in one of the top 25% scoring areas from CalEnviroScreen. CalEnviroScreen is a screening tool used to help identify communities disproportionately burdened by multiple sources of pollution and with population characteristics that make them more sensitive to pollution.[5] The CalEnviroScreen mapping tool identifies the Project site and adjacent properties as having a pollution burden in the 95th percentile (out of 100). Other nearby neighborhoods are in the 49th percentile. Therefore, residents living in the vicinity are already subjected 0-8.22

[5] Information on Disadvantaged Communities and the CalEnviroScreen 4.0 mapping tool can be found at : https://oehha.ca.gov/calenviroscreen/sb535 and https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40

to higher pollution burdens and thus are more sensitive to even seemingly small incremental increases in that burden. *See, e.g., Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025; *Kings County Farm Bureau v. City of Hanford, et al* (1990) 221 Cal.App.3d 692, 718. Given the fact that the surrounding community is already disproportionally impacted by the number of industrial projects in the area, one would expect the DEIR to factor this into the analysis. Unfortunately, this is not the case.

0-8.22 Cont.

Failure to recognize that the larger Project area is a disadvantaged community constitutes a substantive oversight, and there are additional deficiencies that further weaken the DEIR's effectiveness as a complete informational document. The Baseline Report documents several failures of disclosure and analysis in the Hazards and Hazardous Materials section, including:

First, the DEIR does not acknowledge the status of area sensitive receptors as being disproportionately burdened, which then leads the DEIR to underestimate the potential impacts of the Project on the community. As discussed, *supra*, the DEIR fails to properly analyze the Project's air quality impacts by not assessing impacts before the application of Project Design Features, which in turn skews the Health Risk Assessment's findings and the DEIR's impact significance conclusion. The DEIR's analysis of health risk does not comply with CEQA.

0-8.23

Second, the DEIR does not discuss the former Landfill No. 5 (Installation Restoration Program Site 3) that is located 1,700 feet east of the Project site along the proposed extension of Cactus Avenue. According to a recent memorandum from AFCEW/CIBW (2022), which is included in the Baseline Report, there may be Per- and Polyfluoroalkyl Substances (PFAS) in the former landfill. The landfill potentially received dried sludge from the wastewater treatment plant digesters and drying beds between 1970 and landfill closure in 1974. *See* Baseline Report at 3. Construction of Cactus Avenue and installation of supporting infrastructure to the Specific Plan area would disturb these former landfill soils. The DEIR should have included the landfill in the existing conditions and assessed disturbance of the landfill in the hazards and hazardous materials section so that mitigation could be identified, if warranted.

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Third, the DEIR does not adequately study the potential for unexploded ordnance. Military munitions may potentially cause soil, groundwater and surface water contamination from munitions residues (including explosives and heavy metals) and may also present safety concerns around unexploded ordnances. *See* DEIR at 4.8-4. According to the Phase I report (DEIR Appendix J-1), the Project site was used for the purpose of ordnance and munitions storage and not their disposal. *See* DEIR at 4.8-24. However, given the history of explosive ordnance storage on the Project site as early as 1949, as

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well as a former munitions burial area (Installation Restoration Program Site 25) located approximately 750 feet southeast of the Project site, an Unexploded Ordnance Survey should be prepared for the entire Project site prior to redevelopment.

The survey should include the Specific Plan area to ensure that ordnances will not be encountered during construction. More importantly, the survey should include the Conservation Easement property as well. The Conservation Easement property is not going to be developed or disturbed, and will be accessible to the public. *See* DEIR at 4.8-29. Any unexploded ordnances in the easement area will not be found during construction – but could be found inadvertently by the general public, which could present an enormous danger due to risk of detonation. To investigate open areas of ground, a geophysical survey should be performed using magnetic and electromagnetic techniques to detect ferrous objects in the subsurface. The survey should include more intrusive investigations in areas of potential concern identified by the geophysical survey. Mitigation measures should be identified to address the safe removal of any objects found and to reduce any significant impacts resulting from the release of hazardous materials into the environment that could affect sensitive receptors.

0-8.25 Cont.

B. The DEIR Fails to Identify Adequate Measures to Mitigate the Impacts of the Release of Hazardous Materials on Sensitive Receptors.

Mitigation Measure HAZ-1 addresses the abatement of hazardous building materials and requires implementation of the recommendations identified in the Phase 1 ESA (DEIR Appendix J-1). Specifically, the measure addresses the removal of 42 pole-mounted transformers and the hazardous materials associated with the poles (including transformer oil). The measure states "In the event that during removal activities, transformer oil is identified or suspected in underlying soils, an assessment of nearby soils and/or hardscapes for PCBs shall be performed in accordance with the requirements set forth in 40 CFR 761." *See* DEIR at 4.8-31. As Mr. Sutton notes in the Baseline Report, unlike releases of motor oils that are relatively easy to identify in soils based on visual staining and odors, PCB-containing oils from transformers are typically clear to yellow in color and odorless. In other words, a release of transformer oil cannot always be easily identified through visual inspection of the surrounding soils, particularly if the release occurred years ago. *See* Baseline Report at 3 and 4. Therefore, mandatory testing for PCBs in the soils surrounding all poles with transformers should be conducted now and the DEIR should identify mitigation measures to address any contamination.

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In sum, the DEIR must analyze the public health effects on sensitive receptors due to the Project's air pollution and hazardous materials impacts and devise feasible, effective, enforceable mitigation for those impacts.

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V. Cumulative Impacts

CEQA requires a discussion of the environmental impacts, both direct and indirect, of the proposed project in combination with all "closely related past, present and reasonably foreseeable probable future projects." Guidelines § 15355(b); *see also* Pub. Res. Code § 21083(b); Guidelines §§ 15021(a)(2), 15130(a), 15358. The discussion of cumulative impacts must "reflect the severity of the impacts and the likelihood of their occurrence," Guidelines § 15130(b), and must document its analysis with references to specific scientific and empirical evidence. *Mountain Lion Coalition v. Cal. Fish & Game Comm'n*, 214 Cal.App.3d 1043, 1047, 1052 (1989). A legally adequate cumulative impacts analysis views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable future projects whose impacts might compound or interrelate with those of the project at hand. "Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." CEQA Guidelines § 15355(b). Cumulative impacts analysis is necessary because "environmental damage often occurs incrementally from a variety of small sources [that] appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact." *Communities for a Better Env't v. Cal. Res. Agency* (2002) 103 Cal.App.4th 98, 114.

Here, the analysis of cumulative impacts in the DEIR is inadequate. First, the list of reasonably foreseeable future projects considered in the DEIR is under-inclusive, especially in light of the potential geographic scope of certain potentially significant impacts. Specifically, the DEIR analysis fails to consider millions of square feet of proposed warehouse facilities, commerce centers, and business parks in the region in addition to the proposed Project. A summary of the proposed projects and estimated square footage of the facilities is provided below:

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<u>March JPA Projects</u>	
Meridian West Bldg 4	87,400 sq. ft.
Veteran's Industrial Park	2,830,000 sq. ft.
Meridian D1 Gateway Aviation	1,158,000 sq. ft.
<u>Riverside Projects</u>	
Old 215 Business Park	183,500 sq. ft.
<u>Moreno Valley Projects</u>	
Edgemont Commerce Center 1	170,000 sq. ft.

Moreno Valley Business Center	168,000 sq. ft.
Compass Danbe Centerpointe	384,500 sq. ft.
PAMA Business Park	366,500 sq. ft.
World Logistics Center	40,400,00 sq. ft.
Heacock Commerce Center	957,000 sq. ft.

Perris Projects

Duke Warehouse	546,000 sq. ft.
Phelan Warehouse	102,500 sq. ft.
Operon HKI	160,500 sq. ft.
Harley Knox Industrial	156,000 sq. ft.
First Harley Knox Industrial	185,000 sq. ft.
Ramona Gateway	1,022,000 sq. ft.
Ramona and Brennan Warehouse	161,000 sq. ft.
Ramona Indian Warehouse	309,500 sq. ft.
OLC3 Warehouse	907,500 sq. ft.
Perris Valley Commerce Center	324,500 sq. ft.
Perris Morgan Industrial Park	296,500 sq. ft.
Chartwell Warehouse	141,000 sq. ft.
Redlands Avenue West Industrial	367,000 sq. ft.
Redlands Avenue West Industrial	258,000 sq. ft.
Wilson Avenue Project	215,500 sq. ft.

Unincorporated Riverside County Projects

Stoneridge Commerce Center	9,500,500 sq. ft.
Harvill Business Center	366,000 sq. ft.
Placentia Logistics Project	243,000 sq. ft.
Rider/Patterson Business Center	815,500 sq. ft.
Harvill and Rider	375,000 sq. ft.

O-8.28 Cont.

Seaton and Cajalco Industrial	361,000 sq. ft.
Majestic Freeway Business Park 13	371,000 sq. ft.
Majestic Freeway Business Park 14	382,500 sq. ft.
Seaton and Perry	183,000 sq. ft.
Majestic Freeway Business Park 17	306,000 sq. ft.
Majestic Freeway Business Park 18	296,500 sq. ft.
Knox Business Park Bldg. D	724,000 sq. ft.
Knox Business Park Bldg. E	477,500 sq. ft.
Muranaka Warehouse Project	321,500 sq. ft.
Oleander Business Park	18,520,000 sq. ft.

0-8.28 Cont.

Together, these projects will result in hundreds of acres of ground disturbance, millions of square feet of new warehouse, business park and industrial uses, and thousands of truck trips, all of which will contribute significantly to impacts related to traffic, public safety, air quality, greenhouse gas emissions, public health impacts, and noise. When the impacts from the proposed Project are added to existing impacts and to impacts from all of the cumulative proposed projects, residents living in the surrounding communities are likely to face even greater exposure to traffic congestion, air pollution, and increasing health risks. In underrepresenting the cumulative conditions and proposed warehouse activity in the surrounding area, the DEIR fails to disclose and analyze the severity of the Project's contributing impact to these cumulative harms.

VI. The DEIR Fails to Consider an Adequate Range of Alternatives.

A proper analysis of alternatives is essential to comply with CEQA's mandate that, where feasible, significant environmental damage be avoided. Pub. Resources Code § 21102 (projects should not be approved if there are feasible alternatives that would substantially lessen environmental impacts); CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(f). Every EIR must describe a range of alternatives to the proposed project that would feasibly attain the project's basic objectives while avoiding or substantially lessening the project's significant impacts. Pub. Resources Code § 21100(b)(4); Guidelines § 15126(d). Therefore, the discussion of alternatives must focus on project alternatives that can avoid or substantially lessening the significant effects of the project, *even if such alternatives would impede to some degree the attainment of the project objectives* or would be more costly. CEQA Guidelines § 15126.6(b), emphasis added; *see also Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089 ("[T]he key to the selection of the range of alternatives is to identify

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alternatives that meet *most* of the project's objectives but have a reduced level of environmental impacts"); emphasis added.

As a preliminary matter, the DEIR's failure to disclose the extent and severity of the Project's broad-ranging impacts necessarily distorts the analysis of Project alternatives. As a result, the alternatives are evaluated against an inaccurate representation of the Project's impacts. Proper identification and analysis of alternatives is impossible until Project impacts are fully disclosed. Moreover, as discussed above, the document's analysis is incomplete and/or inaccurate so that it is simply not possible to conduct a comparative evaluation of the Project's and the alternatives' impacts.

The DEIR analyzes four alternatives: 1) No Project; 2) Reduced Development Alternative; 3) Restricted Industrial Building Size Alternative; and 4) Reduced Cultural Resource Impact Alternative. The Restricted Industrial Building Size Alternative proposes a 20% reduction in potential industrial development for the Project area, but DEIR fails to contemplate an alternative (beyond the No Project Alternative) that does not include any industrial warehousing. Given a non-warehouse alternative's ability to reduce the Project's significant impacts and the extensive public opposition to siting warehouses so close to residential neighborhoods, this omission violates CEQA. For the reasons discussed below, the DEIR fails to provide a "reasonable range" of alternatives. 0-8.29 Cont.

For an alternative to be considered, it must be able to substantially reduce the Project's significant environmental impacts or offer substantial environmental advantages over the proposed project. *See Watsonville Pilots Ass'n,* 183 Cal.App.4th at 1089; *Cleveland Nat'l Forest Found. v. San Diego Ass'n of Gov'ts* (2017) Cal.App.5th 413, 436. Here, the DEIR acknowledges that even a mere 20% reduction in industrial warehouse development at the Project site would lessen the Project's air quality, energy, greenhouse gas emissions, hazards/hazardous materials, land use/planning, noise, population and housing, public services, recreation, transportation, utilities/service systems, and wildfire impacts. *See* DEIR at 6-4 to 6-5, 6-27 to 6-40. This is important given that many of those impacts—including air quality and noise—remain significant and unavoidable under the proposed Project.

Indeed, removal of all industrial warehouse elements from the Project has the potential to further reduce vehicle trips and lessen the air pollutant emissions that would otherwise come from construction and operation of the proposed warehouses. *See* DEIR at 6-27; Baseline Report at 7. For example, on average, a warehouse development with its "relatively high number of both passenger car and heavy-duty truck trips" generates over three times as much NOx emissions as an office development of the same size. Baseline Report at 7-8 (Table 2). A non-warehouse alternative could lessen the impacts of the proposed Project while still offering redevelopment opportunities. Without a warehouse

component, the Project's operational noise impacts could also go down. *Id.* at 6-34. The DEIR found that the Restricted Industrial Building Size Alternative would have similar construction and grading noise impacts as the proposed Project, but total elimination of warehouses would reduce that warehouse-based construction and grading noise, thereby potentially further reducing overall noise impacts.

A non-warehouse alternative could also readily meet all of the Project objectives. Here, the DEIR lists seven project objectives:

- Provide increased job opportunities for local residents through the provision of employment-generating businesses.
- Provide open space amenities to serve the region.
- Provide an active park consistent with the 2009 Safety Study prepared by March JPA.
- Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Development Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.
- Remove and redevelop a majority of the former munitions storage area of the March AFB.
- Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient, and comfortable.
- Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in *Center for Biological Diversity v. Jim Bartel, et al.* to preserve open space through establishing a Conservation Easement.

0-8.29 Cont.

DEIR at 1.5. The DEIR rejected consideration of an "All Residential Alternative" because it "would not meet the basic Project objectives to provide increased job opportunities for residents through the provision of employment-generating businesses or to implement the terms and conditions of the CBD Settlement Agreement," which requires a conservation easement. DEIR at 6-2 and 6-3. But an alternative that eliminates industrial warehouse use while still keeping the other economic components of the Project and maintaining the conservation easement would avoid both of those issues and still satisfy all of the Project objectives. It would still create increased job opportunities, provide open space amenities, allow for an active park, complete the build out of roadway structure, redevelop the former munitions storage area, encourage alternative transit, and satisfy the CBD Settlement Agreement through a conservation easement. While a warehouse-free alternative might achieve the Project's first objective to a "lesser extent" than the Project, this is not sufficient to eliminate it from consideration. *See* DEIR at 6-27; *Mira Mar Mobile Comm. V. City of Oceanside* (2004) 119 Cal.App.4th 477, 489.

Finally, a non-warehouse alternative must be considered because it offers a fully feasible way to reduce the Project's significant impacts while still meeting the Project's objectives. For instance, the JPA could consider replacing warehouses with an alternative, less impactful industrial use. For instance, within the Industrial designation, the March General Plan contemplates research and development centers, maintenance shops, emergency service centers, vocational education and training facilities, and business and trade schools. Alternatively, the JPA could consider an alternative that amends the West Campus land use designations to eliminate the Industrial designation altogether. Though the March General Plan encourages a balance mix of land uses, industrial uses can be and have been sited on other portions of the March Air Force Base and need not necessarily be included in the West Campus subarea.

0-8.29
Cont.

The DEIR's failure to consider a non-warehouse alternative is especially egregious in light of the Project's close proximity to thousands of homes and the repeated requests from R-NOW and other members of the public to consider alternative uses for the site. The DEIR's Restricted Industrial Building Size Alternative is a strawman response to public concern regarding the Project warehouses. A 20% reduction to the warehouse component would alleviate the Project's significant environmental impacts only to a limited degree, but the JPA must consider a full range of feasible alternatives that will *substantially* reduce these effects.

In this case, where the proposed Project presents very real dangers for the surrounding communities in a region already suffering from too many warehouse developments, it is especially important that the DEIR analyze alternatives that could avoid or lessen the Project's impacts. *See* CEQA Guidelines § 15126.6(c). The DEIR's failure to do so violates CEQA. *See Habitat & Watershed Caretakers v. City of Santa*

Cruz (2013) Cal.App.4th 1277, 1304 (failure to consider limited-water alternative violates CEQA); *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1464-6.5. Because the DEIR provides no reasonable explanation as to why a non-warehouse alternative that would reduce the inevitable damage from the proposed Project was not considered, the alternatives analysis must be revised to include a full analysis of such an alternative. 0-8.29 Cont.

VII. The Proposed Project Fails to Comply with the March General Plan Policy Requirements.

State Planning and Zoning Law (Gov't Code § 65000 et seq.) requires that development decisions be consistent with the jurisdiction's general plan. *See, e.g.*, Gov't Code §§ 65860, 66473.5, 66474, 65359, 65454. Thus, "[u]nder state law, the propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." *Resource Defense Fund v. County of Santa Cruz* (1982) 133 Cal.App.3d 800, 806. Accordingly, "[t]he consistency doctrine [is] the linchpin of California's land use and development law." *Families Unafraid to Uphold Rural El Dorado County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1336.

It is an abuse of discretion to approve a project that "frustrate[s] the General Plan's goals and policies." *Napa Citizens for Honest Gov't v. Napa County* (2001) 91 Cal.App.4th 342, 379. The project need not present an "outright conflict" with a general plan provision to be considered inconsistent; the determining question is instead whether the project "is compatible with and will not frustrate the General Plan's goals and policies." *Napa Citizens*, 91 Cal.App.4that 379. Here, the proposed Project does more than just frustrate the General Plan's goals. It is directly inconsistent with numerous provisions in the General Plan—a violation of State Planning and Zoning Law. 0-8.30

Moreover, the DEIR pays short shrift to these inconsistencies and fails to analyze the Project's consistency with said policies. This omission violates CEQA, which requires an analysis of potential conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. *See* CEQA Guidelines, App. G, § XI(b).

Some of the clear inconsistencies are as follows:

General Plan Policy	Project Inconsistency
Policy 2.4: Protect the interests of, and existing commitments to adjacent	The proposed Project would bring warehouse development into the heart of a

residents, property owners, and local jurisdictions in planning land uses.	site surrounded by residential neighborhoods on three sides in direct conflict with the express wishes and interests of those residents.
Policy 3.2: Manage the development and reuse of the Planning Area to…minimize impacts on natural environmental resources.	The proposed Project would have significant and unavoidable impacts on natural environmental resources, including Air Quality.
Policy 4.1: Develop and maintain a land use land for the Planning Area which proposes compatible land uses to create distinct, identifiable historic, commercial, industrial, public, and aviation areas.	The proposed Project would move Industrial and Business Park designations away from other industrial areas on the east end of the West Campus site and place it closer to residential areas.

0-8.30 Cont.

VIII. Conclusion

As set forth above, the DEIR does not come close to satisfying CEQA's requirements. At a fundamental level, it fails to take into account the Project setting when evaluating impacts to sensitive receptors and fails to provide a complete analysis of Project impacts, feasible mitigation measures, and alternatives. For these reasons, R-NOW respectfully requests that the March JPA not approve the West Campus Upper Plateau Project as proposed. All of these impacts must be more fully addressed, and a less impactful alternative analyzed, before the Project can be considered.

0-8.31

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Tori Ballif Gibbons

Tori Ballif Gibbons

Appendices:

Appendix A – Report by P. Sutton, Air Quality Specialist, Baseline Environmental, Inc., March 8, 2023.

Appendix B – Articles regarding impacts from growth of warehouse industry in California

Appendix C – Map of Existing Warehouse Uses

Appendix D – World Logistics Center Settlement Agreement

Appendix E – CenterPoint Properties Warehouse Project Conditions of Approval, approved May 2022.

Appendix F – Mariposa Industrial Park Project Mitigation Monitoring and Reporting Program, approved December 2022.

Appendix G – City of Fontana Ordinance 1891, mandatory measures for warehouse/fulfillment center projects.

cc: R-NOW
Javier Enriquez**,** South Coast Air Quality Management District
Attorney General Environmental Justice Bureau

APPENDIX A

8 March 2023
23205-00

Carmen J. Borg
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421

Subject: **Review of Hazardous Materials, Air Quality, and Greenhouse Gas Impacts Analyzed in the Draft Environmental Impact Report for the West Campus Upper Plateau Project**

Dear Ms. Borg:

Baseline Environmental Consulting (Baseline) has reviewed the Draft Environmental Impact Report (DEIR) for the West Campus Upper Plateau Project (project) in the City of Riverside, California, to determine whether potential environmental impacts related to hazardous materials, air quality, and greenhouse gas (GHG) emissions were properly evaluated. Based on our review, we have identified flaws in the DEIR analysis used to support the significance determinations. The specific concerns identified in our review of the DEIR for potential environmental impacts related to hazardous materials, air quality, and GHG emissions are described in detail below. 0-8.32

HAZARDOUS MATERIALS CONCERNS

Unexploded Ordnance Hazards

Currently, there are 14 earth-covered bunkers located within the Specific Plan Area that were used for storage of various weapons systems (e.g., bombs and missiles) from the mid-1950s until the early 1980s, as well as small arms ammunition until prior to base closure.[1] A former munitions burial area referred to as Installation Restoration Program Site 25 is located southeast of the Specific Plan Area within the Conservation Easement. Given the history of explosive ordnance storage and disposal within the Specific Plan Area and Conservation Easement, an Unexploded Ordnance Survey Report should be performed for the entire project site prior to project redevelopment to ensure the safety of future site users. 0-8.33

The survey should include the entire Specific Plan Area and Conservation Easement that would be accessible to the public. The findings of previous surveys (if any) should be included in the report. To investigate tracts of open land, a geophysical investigation could be performed using magnetic and electromagnetic techniques to detect ferrous objects in the subsurface. The survey should include more intrusive investigations in areas of potential concern identified by the initial

[1] Cabrera Services, Inc., 2006. Final Preliminary Assessment and Site Inspection Report for the Former Weapons Storage Area, March Air Force Base, Riverside, California. September.

geophysical survey. Based on the findings of the survey, the report should include recommendations for the safe removal and disposal of potentially unexploded ordnance.

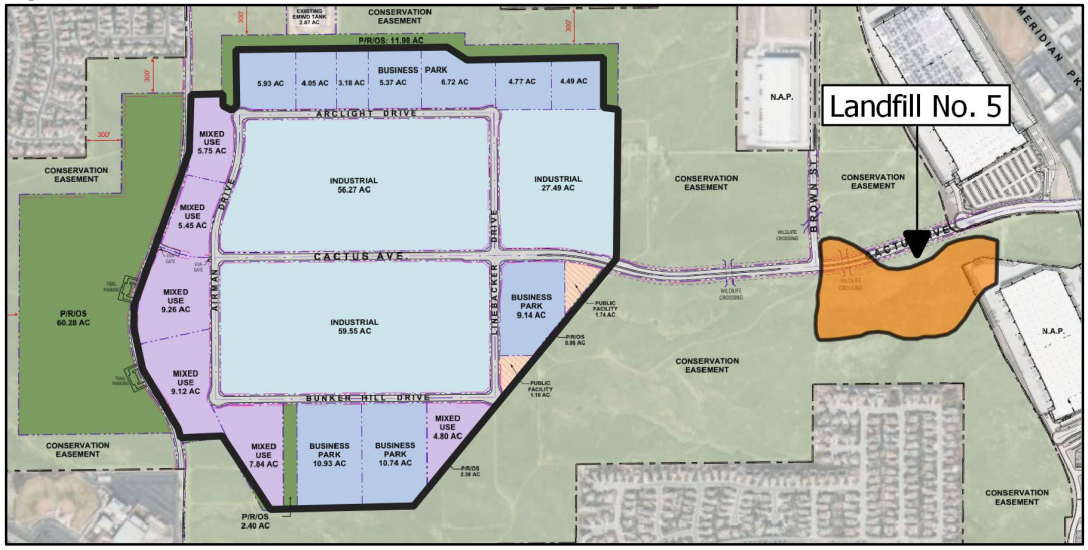
The DEIR should be revised to include a summary of previous unexploded ordnance surveys (if any) in the project vicinity and a mitigation measure that requires the preparation of an Unexploded Ordnance Survey Report and implementation of associated recommendations to safely remove and dispose of potentially unexploded ordnance prior to construction of the project.

0-8.33 Cont.

Residual Contamination from Former Landfill No. 5

The DEIR does not discuss the former Landfill No. 5 associated with the former March Air Force Base (also referred to as Installation Restoration Program Site 3) to the east of the Specific Plan Area within the Conservation Easement. The proposed extension of Cactus Avenue would traverse the former landfill (**Figure 1**).

Figure 1. Former Landfill No. 5 Location



The landfill was used from 1954 to 1974 and received household and dumpster waste, construction debris, and military waste (e.g., spent munitions, medical waste, fire hoses) from the March Air Force Base. Contaminants found in the wastes included volatile organic compounds, pesticides, polychlorinated biphenyls (PCBs), polynuclear aromatic hydrocarbons (PAHS), and munitions residues. In 1995, approximately 223,220 cubic yards of landfilled materials and soil were excavated and removed from the former landfill site. Confirmation sampling conducted after the excavation activities indicated that residual PCBs and PAHs remained in the former landfill area.[2]

0-8.34

[2] United States Department of the Air Force, 2004. Former March Air Force Base, California, Operable Unit 2, Air Force Real Property Agency, Record of Decision. April.

According to a recent report prepared for the former March Air Force Base, there may be per- and polyfluoroalkyl Substances (PFAS) in the former landfill because it potentially received dried sludge from the wastewater treatment plant digesters and drying beds between 1970 and landfill closure in 1974.[3] The March Air Force Base began purchasing and using multiple aqueous film-forming foam firefighting agents containing PFAS to extinguish petroleum fires and for use in firefighting training activities in 1970. Aqueous film-forming foam was also used in hangars with foam fire suppression systems, at plane crash and emergency response sites, and at firefighting equipment testing areas. The historical use of foam firefighting agents has resulted in the presence of PFAS in groundwater and soil at and near the former March Air Force Base.

PFAS persist in the environment and current scientific research indicates that human exposure can affect reproduction, thyroid function, the immune system, and injure the liver. Two of the most studied PFAS are perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA). The United States Environmental Protection Agency has published a drinking water health advisory level of 70 nanograms per liter (ng/L) for the sum of PFOS and PFOA. In February 2020, the State Water Board Division of Drinking Water (DDW) issued drinking water response levels (RLs) for PFOS and PFOA at 40 and 10 ng/L, respectively, which are the concentrations at which the DDW recommends removing a public water system from service or providing treatment.

0-8.34 Cont.

The DEIR should be revised to evaluate the potential impacts that could result from disturbing residual soil contamination in former Landfill No. 5, including potential PFAS. The analysis should address potential impacts from soil disturbance during construction of the Cactus Avenue extension and supporting infrastructure for the proposed project. The analysis should also address potential impacts from changes to drainage patterns and stormwater runoff that could potentially increase leaching of soil contamination to groundwater.

Inadequate Mitigation of Transformer Oil Spills

As discussed on page 4.8-19 of the DEIR, there are 42 pole-mounted transformers on the project site that may contain oils with PCBs, which are highly carcinogenic chemical compounds that persist in the environment. DEIR Mitigation Measure (MM) HAZ-1 (page 4.8-31) requires the removal of the pole-mounted transformers and states "In the event that during removal activities, transformer oil is identified or suspected in underlying soils, an assessment of nearby soils and/or hardscapes for PCBs shall be performed in accordance with the requirements set forth in 40 CFR 761."

0-8.35

Unlike releases of motor oils that are relatively easy to identify in soils based on visual staining and odors, PCB-containing oils from transformers are typically clear to yellow in color and odorless. In other words, a release of transformer oil cannot always be easily identified based on inspection of the surrounding soils, particularly if the release occurred years ago. Therefore, we recommend that

[3] Aerostar SES LLC, 2022. Final Quality Program Plan for Remedial Investigation of Per- and Polyfluoroalkyl Substances at Former March Air Force Base and March Air Reserve Base, California. May.

mandatory testing for PCBs in the soils surrounding all poles with transformers be conducted now and the DEIR should identify mitigation measures to address any contamination. 0-8.35 Cont.

AIR QUALITY CONCERNS

Inadequate Evaluation of Project Design Features

The DEIR includes Project Design Feature (PDF) AQ-1 that requires all offroad equipment used during construction meet the California Air Resources Board Tier 4 Final emission standards or better (page 1-7). Like a mitigation measure, implementation of Tier 4 Final emissions standards under PDF-AQ-1 would reduce the project's air pollutant emissions and associated air quality impacts. The DEIR included the use of Tier 4 final emission standards under PDF-AQ-1 in the analysis of the project's unmitigated air quality impacts. Based on the *Lotus v. Department of Transportation* (223 Cal. App.4th 645) decision, the DEIR should be revised to first evaluate the project's air quality impacts without implementation of PDF-AQ-1, and then evaluate the effectiveness of PDF-AQ-1 to reduce air quality impacts. 0-8.36

Emergency Generators

The DEIR does not discuss if emergency generators would be required to operate the proposed warehouses in the event of a power loss. In our professional experience, warehouse facilities typically include at least one stand-by emergency generator. Therefore, the DEIR should be revised to discuss the potential need for emergency generators and estimate the associated air pollutant emissions and health risks from annual maintenance and testing of the generators. 0-8.37

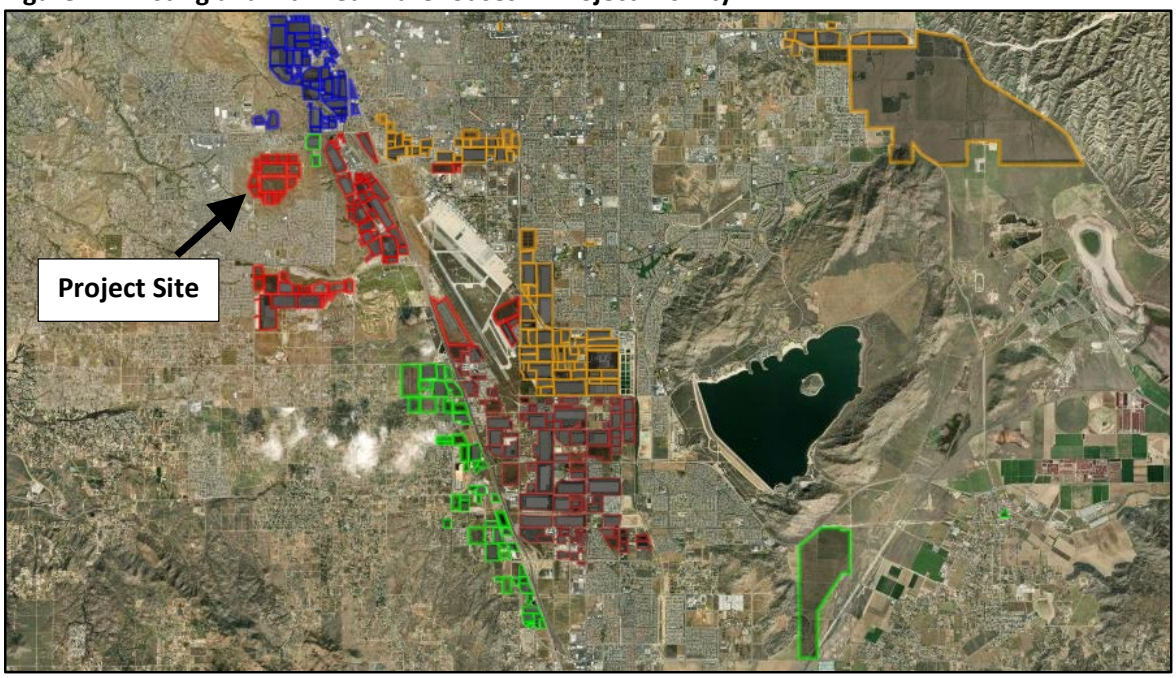
Cumulative Health Risks

Based on a study prepared by the Riverside Neighbors Opposing Warehouses, there are about 280 existing and planned warehouses located in the project vicinity along the I-215 highway corridor (**Figure 2**). These warehouses would generate about 90,000 truck trips daily.[4] Based on review of aerial images, most of the existing warehouses were built in the last 15 years.

In 1996, Caltrans verified that trucks travelling along I-215 at the I-60 junction accounted for about 12.3 percent of the total daily traffic volume. In 2020, Caltrans estimated that the total average annual daily traffic volume along I-215 at the I-60 junction was about 353,000 vehicles per day.[5] The additional truck traffic volume from the 280 existing and planned warehouses in the project vicinity could account for up to about 25.5 percent of the total daily traffic volume. This is a significant increase in the volume of diesel trucks travelling along I-215 in recent years. 0-8.38

[4] Riverside Neighbors Opposing Warehouses, 2023. Warehouses on the 215/60 Corridor. https://radicalresearch.shinyapps.io/MarchJPA/. Accessed on March 3.
[5] Caltrans, 2020. Traffic Census Program, Truck Traffic: Annual Average Daily Truck Traffic for Truck Traffic on California State Highways.

Figure 2. Existing and Planned Warehouses in Project Vicinity



Notes: Warehouse shown are color-coded by jurisdiction.
Source: https://radicalresearch.shinyapps.io/MarchJPA/.

There are residential neighborhoods adjacent to I-215 that are exposed to the emissions of diesel particulate matter from the exhaust of trucks travelling along the highway corridor. The DEIR provides no analysis of the cumulative health risks to the nearby residential communities along I-215 from truck trips generated by the project and existing and planned warehouses in the project vicinity.

It is the lead agency's responsibility to ensure cumulative health risks are adequately evaluated. The U.S. Environmental Protection Agency's guidance for air toxic analyses at the community-scale level considers a cancer risk of 100 in a million or less to be within the "acceptable" range of cancer risk.[6] This is a common cumulative threshold that is considered by other lead agencies in California, such as the City of San Francisco. Given the surrounding and the nature of the proposed project, the DEIR should be revised to evaluate the cumulative health risks to nearby residences due to the high volume of diesel truck traffic that would be generated by the project and the heavy density of existing and planned warehouses in the project vicinity.

0-8.38 Cont.

[6] Bay Area Air Quality Management District, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance. October 2009, p. 67.

GREENHOUSE GAS EMISSIONS CONCERNS

Consistency with 2022 CALGreen

The DEIR briefly discusses the 2019 California Green Building Standards Code (CALGreen) (page 4.7-23) but does not reference the current 2022 CALGreen code that went into effect on January 1, 2023, and fails to mention any of the mandatory electric vehicle (EV) and photovoltaic (PV) infrastructure requirements that apply to non-residential structures such as business parks and warehouses. The EV and PV infrastructure requirements under 2022 CALGreen are some of the most impactful provisions for proposed developments to reduce GHG emissions.

According to 2022 CALGreen, for non-residential projects with more than 200 parking spaces, at least 20 percent of the spaces must be EV Capable[7], and 25 percent of those spaces must be equipped with Level 2 Electric Vehicle Supply Equipment. CALGreen also includes voluntary measures organized into two tiers (Tier 1 and Tier 2) that go beyond the minimum EV infrastructure requirements. Under 2022 CALGreen, new office developments must provide a minimum PV system of 2.59 watts per square foot (W/ft^2) of floor area, retail 2.62 W/ft^2 of floor area, and warehouses 0.39 W/ft^2 of floor area.

The DEIR includes MM-GHG-7 (page 4.7-42), which requires the installation of circuitry and capacity for a minimum of 20 EV charging stations consistent with the County's Climate Action Plan. The DEIR does not identify how many parking spaces will be included in the project design, but assuming there will be at least 200 spaces, then the 20 EV Capable spaces required under MM-GHG-7 are substantially below the minimum 20 percent requirement described under 2022 CALGreen.

The DEIR also includes PDF-GHG-1 (page 1-7), which requires the installation of a conduit in logical locations that would allow for the future installation of charging stations for electric trucks. This design feature is vague and fails to provide adequate performance standards to assure that the project will be designed to comply with 2022 CALGreen.

The DEIR includes MM-GHG-1 (page 4.7-41), which requires the installation of a PV system that will generate at least 30 percent of the building's power requirements. However, the DEIR fails to evaluate if this measure is adequate to meet the PV system requirements described under 2022 CALGreen. As an example, **Table 1** shows that the estimated PV system size for one of the proposed business parks would need to provide about 58 percent of the building's electricity demand to meet the 2022 CALGreen requirements. Therefore, implementation of MM-GHG-1 would be inadequate to satisfy the requirements of 2022 CALGreen.

0-8.39

[7] "EV capable" means a vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways, both underground and/or surface mounted, to support EV charging.

Table 1. CALGreen 2022 PV System Design Requirements for a Project Business Park

Land Use	Size (ft^2)[A]	Electricity Demand (kWh/year)[B]	2022 CALGreen PV System Design Requirements[C]				
			PV Capacity Factor (W/Ft^2)	PV System Size (kW)	Annual Solar Activity Factor for Riverside (kWh/kW)[D]	Annual PV System Generation (kWh)	Percent of Building Energy Use
Business Park	1,280,403	12,272,774	3.13	4,008	1,790	7,173,714	**58%**

Notes: ft^2 = square feet; W = watts; kW = kilowatts; kWh = kilowatt hours
[A] DEIR page 1-5.
[B] DEIR Appendix F Energy, page 43.
[C] 2022 California Energy Code, Title 24, Section 140.10.
[D] Sunwatts, 2023. Solar Hours Per Day. https://sunwatts.com/calculate-how-much-solar/. Accessed on March 3.

0-8.39 Cont.

Carbon Neutrality

In accordance with Executive Order B-55-18, California is committed to achieving carbon neutrality by 2045. The primary sources of GHG emissions from the project would be from building energy use and transportation; therefore, the DEIR should have evaluated if the project can be designed to ensure it will achieve carbon neutrality by 2045. The DEIR should be revised to evaluate the feasibility and effectiveness of installing EV parking and PV infrastructure beyond the minimum requirements of 2022 CALGreen to reduce the project's GHG emissions and align the project with California's long-term climate goal of carbon neutrality by 2045.

0-8.40

ALTERNATIVE ANALYSIS

Page 4.2-28 of the DEIR identified a significant and unavoidable impact related to operational-source emissions of criteria air pollutants. The primary source of operational emissions is from mobile sources (e.g., passenger cars and trucks). The DEIR did not summarize or evaluate the contribution of each proposed land use to the project's overall mobile emissions.

In general, a warehouse development generates a relatively high number of both passenger car and heavy-duty truck trips that result in substantially higher air pollutant emissions than an office development of a similar size. For example, **Table 2** summarizes the estimated mobile emissions of nitrogen oxides (NOx) from an office versus a warehouse development of the same size (100,000 square feet). As shown in **Table 2**, the warehouse generates over three times as much NOx emissions per day from mobile sources than the office.

The DEIR alternative analysis should be revised to provide a detailed analysis of how proposing more office or other land use types than warehouses would help to substantially reduce the mobile emissions and associated severity of air quality impacts from the proposed project.

0-8.41

Table 2. Estimated Mobile NOx Emissions for an Office Versus a Warehouse

Land Use	Vehicle Type	Trips/KSF[A]	Size (KSF)	Total Trips	Miles per Trip[B]	Daily VMT	NOx EF (g/mi)[C]	NOx Emissions (g/day)
Office	Passenger	11.06	100	1,106	20	22,120	0	818
Warehouse	Passenger	11.87	100	1,187	20	23,740	0	878
	Truck	0.57	100	57	32	1,824	1	1,687

Notes: KSF = thousand square feet; VMT = vehicle miles travelled; NOx = nitrogen oxides; EF = emission factor; g = grams; mi = miles.

[A] DEIR Appendix N Transportation, Table 4-1: Calculated Trip Generation Rates, page 62.

[B] DEIR Appendix C-1 Air Quality Technical Report. Back calculated from trip distance from CalEEMod results.

[C] California Air Resources Board, 2023. EMFAC2021 version 1.0.2, Onroad Emission Rates for Riverside County in the summer of 2023 for gasoline-powered passenger cars (LDA) and diesel-powered trucks (MHDT). https://arb.ca.gov/emfac/emissions-inventory/. Accessed on March 3.

0-8.41 Cont.

CONCLUSIONS

Based on our review of the DEIR, there is substantial evidence that the project has not properly evaluated environmental impacts related to hazardous materials, air quality, and GHG emissions. Therefore, Baseline recommends that the DEIR be revised and recirculated to address the environmental concerns described above.

0-8.42

Sincerely,

Patrick Sutton,
Principal Environmental Engineer

APPENDIX B



CALMATTERS

COMMENTARY

California warehouse boom comes with health, environmental costs for Inland Empire residents



BY JIM NEWTON
JANUARY 26, 2023



Large warehouses including an Amazon fulfillment center in San Bernardino on Jan 26, 2022. Photo by Jay Calderon/The Desert Sun

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IN SUMMARY

In 1980, the Inland Empire was home to 234 warehouses. There are now more than 4,000, providing significant economic benefits for the region. But this growth also has consequences: more unhealthy air days in predominantly Latino communities. Following the release of a new report, a coalition is asking state leaders to intervene.

0-8.43 Cont.

Drive east from downtown Los Angeles, and the scenery thins out. The land grows drier, the hills rougher. The desert encroaches. Beverly Hills and Hollywood are replaced by Pomona, Fontana, Rialto, Redlands.

This is the Inland Empire, home to more than 4 million people and perched at the periphery of Los Angeles. Some dismiss it as the **"land of cheap dirt."**

It's not just any cheap dirt, though. It's cheap dirt within a few hours' drive of one of the world's largest port complexes – Los Angeles and Long Beach together represent America's chief point of importation from Asia – and well-positioned to feed the nation's growing obsession with ordering goods online and expecting them to arrive instantly.

The result: California's Inland Empire has become home to a cascade of warehouses.

Today, warehouses occupy about 1 billion square feet of the Inland Empire. Another 170 million square feet has either been approved and is awaiting construction, or is pending approval from a local government.

In 1980, the region was home to 234 warehouses; there are now more than 4,000. And individual warehouses are getting bigger, too. Nearly 40 square miles of the region's land today sit beneath the roof of a warehouse.

With that growth have come jobs and benefits. The Inland Empire has been quick to rebound from COVID and is chugging along at employment levels that resemble a pre-pandemic economy.

But warehouses and the industries they support also carry consequences. Warehouses are not standalone buildings; they take in goods and move them out again – mostly with trucks, which burn fuel and clog up streets and highways. The 4,000 warehouses that line the region's transportation corridors generate some 600,000 truck trips every day, producing a staggering 50 million pounds of carbon dioxide.

The implications for climate change and personal health are daunting. In just one year, from 2019 to 2020, the number of unhealthy air days in San Bernardino County jumped from 15% of the calendar to 20% of all days. And, predictably, the negative effects of that pollution and related traffic congestion are overwhelmingly concentrated in neighborhoods inhabited mostly by Latinos and low-income residents.

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Small cities such as Fontana show the effects of this hellbent absorption of warehouses. With a population of just over 200,000 people, Fontana houses distribution centers for Coca-Cola, Target, Smart & Final and FedEx, among others. Since 2010, Fontana has approved more than 70 new warehouses, which cover some 860 acres and produce more than 16,000 truck trips a day.

Those findings are part of a groundbreaking project spearheaded by a group of activists and analysts who have created a database and map to track the growth of warehouses in the region. One of them is **Susan Phillips**, a professor of environmental analysis at Pitzer College and director of the Robert Redford Conservancy for Southern California Sustainability.

"This is really, really scary," she said in an interview, adding that some planners seem not to grasp the problem while others willfully ignore its implications. "They've made the choice not to care about the health impact."

The growth in warehouses is in part a reflection of changes in the national and international economy. Indeed, most of the goods that pass through these warehouses are not bound for the Inland Empire at all. It's merely a waystation for everything from pharmaceuticals to toys, arriving from Asia and making their way to points east of Fontana or San Bernardino.

The phenomenon also reveals holes in the region's approach to planning. Warehouses typically are approved by local officials, often with little consideration for their impact on neighbors even though the cumulative effect of the new warehouses is regional rather than localized (pollution and traffic don't stop at a city's edge). But calls for regional planning test the Inland Empire's politics and its structure, leading to **confusing, uncoordinated policy decisions**.

In response, Phillips and her colleagues produced a breakthrough, interactive map called **Warehouse CITY**. It cuts through confusing government jargon – some cities label warehouses as "warehouses" whereas others rely on euphemisms such as "light industrial property" – and puts together a searchable, overarching look at the growth in warehouses in recent years. This allows users to chart the development of these buildings across Southern California and visualize the footprint.

It also explains why this is so urgent for the people who are tracking this issue. They have gathered their findings in a report entitled **"A Region in Crisis,"** which they forwarded to Gov. Gavin Newsom this week, along with a letter urging him to intervene.

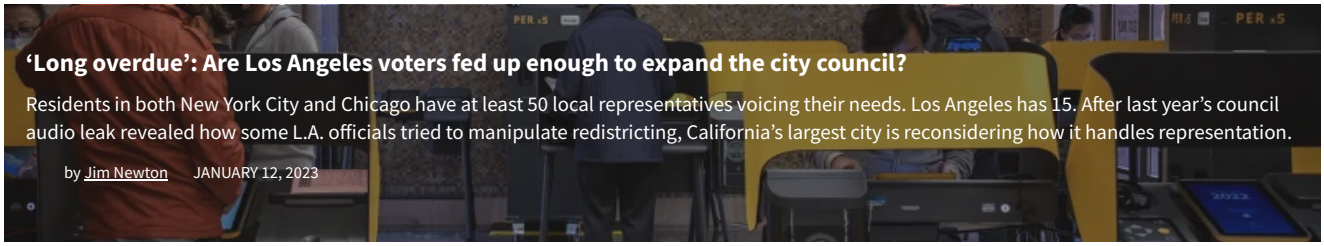
The coalition called on Newsom to declare a "state of emergency and public health crisis in the Inland Empire." They also asked state leaders to adopt a moratorium on new warehouse construction until the health and environmental consequences of this explosive warehouse growth can be better understood.

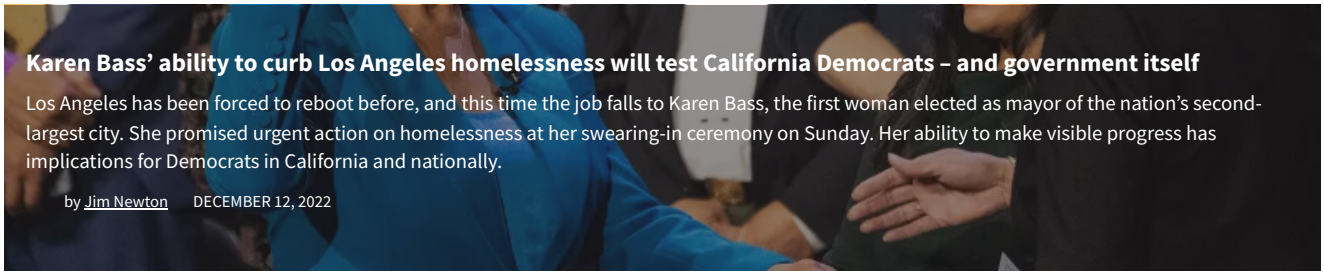
That's a tall order, one that will pit the interests of some of the nation's largest manufacturers and distributors against local concerns. It will invite the typical decrying of NIMBYism, and it will hit residents where they live – in availability of jobs, the health of their air and the vitality of their communities.

——

Given the stakes for the region and the political test this issue poses for local and state leaders, CalMatters contributor Jim Newton will be revisiting this subject again in the coming months.

MORE COMMENTARY FROM JIM NEWTON





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Los Angeles Times

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CALIFORNIA

Inland Empire residents are fighting warehouse sprawl



A coalition is calling for a moratorium of up to two years on new warehouse development in Southern California's Inland Empire, asking Gov. Gavin Newsom to declare the region's warehouse sprawl a "public health emergency." (Robert Gauthier / Los Angeles Times)

BY RYAN FONSECA | STAFF WRITER

FEB. 7, 2023 5:58 AM PT

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Good morning, and welcome to the Essential California newsletter. It's **Tuesday, Feb. 7.**

E-commerce has created a world where we can order something with a few quick taps on our phones, then find it on the doormat within days (or even hours).

For a growing number of consumers, there's a decent chance the contents of their packages came from a warehouse in the Inland Empire.

The region, which includes large swaths of communities in Riverside and San Bernardino counties, has become the dominion of thousands of massive warehouses, storing millions of consumer goods trucked in from coastal ports and bound for front doors and mailboxes across California and the nation.

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According to one research group's mapping data, warehouses cover more than 1.5 billion square feet of land there (including parking lots). An additional 170 million square feet of warehouses are planned or under construction, enough to cover the city of West Hollywood about three times over.

The resulting impacts have many residents, farmers and environmental advocates worried.

Rachel Uranga covers transportation and mobility for The Times and reported on the changing landscape in the Inland Empire. She writes:

> *Residents are questioning whether they want the region's economy, health, traffic and general ambiance tied to a heavily polluting, low-wage industry that might one day pick up and leave as global trade routes shift.*

Rachel told me the issue is the "perfect intersection" of business, consumer culture and transportation issues.

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"E-commerce is really reshaping parts of Southern California," she told me. "For a lot of people, it's out of their sight — the only way they see it is the little Amazon truck comes up and delivers your packet and leaves ... but it's so deeply changed [the IE]."

Moving thousands of warehouses' worth of product relies on big, diesel-burning trucks, which clog and crack local streets and freeways. They also contribute to the region's terrible, harmful air quality.

The IE now holds the crown for smoggiest place in the U.S., according to the American Lung Assn. The constant stream of trucks rolling to and from all those warehouses "spew out a cocktail of pollutants, including particulates that lodge in human lungs," Rachel reports.

Researchers have linked the truck pollution to serious health hazards such as asthma, decreased lung function in children and cancer.

"We know diesel exhaust is a killer," William Barrett, national senior director of clean air advocacy for the American Lung Assn., told Rachel. "It's one of the most damaging things that your lungs can experience."



A family walks in their Jurupa Valley neighborhood, which is surrounded on two sides by giant warehouses, in 2021. (Gina Ferazzi / Los Angeles Times)

Residents, advocates and environmental researchers want that to change. A coalition of more than 60 environmental, labor, community and academic groups wrote a letter to Gov. Gavin Newsom, asking him to declare the region's warehouse sprawl a "public health emergency." The group also called for a moratorium of up to two years on new warehouse development in the region.

The group has accused local politicians of "environmental racism," Rachel reports, contending they've been "ignoring health impacts while collecting donations from

0-8.43 Cont.

developers and their allies."

Some cities in and near the Inland Empire have already put a hold on new warehouses. A spokesperson for Newsom did not say whether the governor supported a regional moratorium, but pointed to Newsom's order that heavy-duty truck manufacturers transition to zero-emission vehicles by 2045.

In the meantime many IE residents continue to live in the shadows of warehouses, breathing harmful pollutants. One resident-turned-activist Rachel spoke with described children waking up "with bloody noses on their pillows."

"We have the worst air quality. We have gridlock," the resident said. "We have streets and communities that were never built for global logistics."

You can read Rachel's full reporting on the issue here.

We have a new reader callout! With Valentine's Day approaching, we think now is a great time to share some California love — and we need your help. Send in your cutest, wittiest Valentine card message, centered on some aspect of life in the Golden State. Here are a few examples from me:

- Are you the Santa Ana winds? Because you sweep me off my feet.
- I'll pick you up from LAX anytime.
- You must be a non-native palm tree because you never throw shade my way.

Now it's your turn! **Submit your ideas here.** We could feature your "Calentine" in an upcoming edition of Essential California (please keep submissions under 50 words).

And now, **here's what's happening across California:**

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POLITICS AND GOVERNMENT

Gov. Gavin Newsom is calling for a federal investigation into California's soaring natural gas bills. He wrote a letter to the Federal Energy Regulatory Commission on Monday, requesting that it help in "assessing whether market manipulation, anticompetitive behavior, or other anomalous activities are driving these ongoing elevated prices in the western gas markets." The Sacramento Bee

California's lawmakers have passed bills supporting unionizing efforts in several industries in the state but **have so far not extended the same legal support to their own staffers.** That could change this session with a new bill introduced by Assemblymember Tina McKinnor (D-Inglewood). CalMatters

San Diego businessman Richard Leib has a new venture: leading the powerful University of California Board of Regents. He says his top priority will be widening access to better reflect California's racial, ethnic, economic and geographical diversity. Los Angeles Times

CRIME, COURTS AND POLICING

Racial profiling continues to proliferate in law enforcement agencies across California, according to data on stops released last week by the state attorney general. An analysis by the San Francisco Chronicle found that police are far more likely to stop and search Black drivers and pedestrians than white people in nearly every part of the state. Data collected from smaller law enforcement agencies showed the disparity is worse in some of the state's wealthiest communities. San Francisco Chronicle

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HEALTH AND THE ENVIRONMENT

With thousands dead and rescuers still searching for survivors, the devastation from the 7.8 earthquake that struck Turkey on Monday is difficult to quantify. The news also naturally takes our minds to the quake-prone ground beneath our own feet. **Here's how a similarly intense temblor would affect Southern California**. Los Angeles Times

Can bighorns, a bullet train and a huge solar farm coexist in the Mojave Desert? Times reporter Louis Sahagún writes about a pair of proposals that are testing "state Fish and Wildlife's ability to mediate compromises among the developers while also planning a sustainable future for complex and fragile ecological networks across the desert." Los Angeles Times

Climate change is straining some often-overlooked amphibians: California's newts. Researchers say worsening drought has dried out their habitats, threatening their ability to reproduce. KQED

CALIFORNIA CULTURE

L.A.'s Crypto.com Arena hosted the 65th Grammy Awards on Sunday night. From historic firsts to controversial snubs to Viola Davis' EGOT (Emmy, Grammy, Oscar and Tony) status, here's a recap of the show and a list of the winners. Los Angeles Times

Free online games

Get our free daily crossword puzzle, sudoku, word search and arcade games in our new game center at latimes.com/games.

AND FINALLY

Today's **landmark love** comes from **Theo Moreno** of Cambria: **Arroyo Laguna Beach**.

Theo writes:

With over 700 miles of coastline, California offers several places where one can surf without a crowd. Sure, the water's a little colder, but the trade-off is well worth the chill. This is a favorite spot of mine in San Luis Obispo County. I didn't know the surfer, but he did get a couple of nice waves.

What are California's essential landmarks? Fill out this form to send us your photos of a special spot in California — natural or human-made. Tell us why it's interesting and what makes it a symbol of life in the Golden State. Please be sure to include only photos taken directly by you. Your submission could be featured in a future edition of the newsletter.

Please let us know what we can do to make this newsletter more useful to you. Send comments to essentialcalifornia@latimes.com.

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Ryan Fonseca

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Ryan Fonseca writes the Los Angeles Times' Essential California newsletter. A lifelong SoCal native, he has worked in a diverse mix of newsrooms across L.A. County, including radio, documentary, print and television outlets. Most recently, he was an associate editor for LAist.com and KPCC-FM (89.3) public radio, covering transportation and mobility. Fonseca studied journalism at Cal State Northridge, where he now teaches the next generation of journalists to develop their voice and digital skills.

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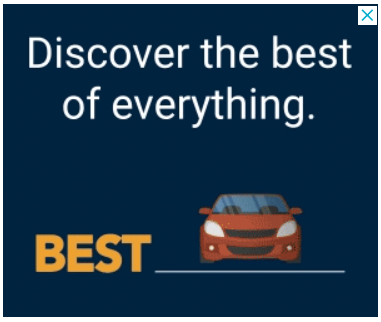


FOOD

Does this new robot-staffed chocolate emporium signal a themed restaurant comeback?

March 2, 2023

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CALIFORNIA

Warehouse boom transformed Inland Empire. Are jobs worth the environmental degradation?



A Walmart distribution center in Eastvale along I-15. (Robert Gauthier / Los Angeles Times)



BY RACHEL URANGA
STAFF WRITER | FOLLOW

FEB. 5, 2023 **UPDATED** 10:42 AM PT

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For decades, Bosch Dairy in Ontario, where three generations raised cattle, was a bucolic outpost with fields of cows and rows of eucalyptus to cut the driving wind that came down the Cajon Pass.

A few years ago, Bud Bosch noticed semitrailers occasionally rumbling along the two-lane rural road by his property. Soon, dozens were kicking up dust, night and day, plying roads made for tractors.

Bosch thought he had escaped the explosion of warehouse development that has wiped out farmland and open space. But the ecommerce boom of the pandemic accelerated the land grab, and the region became ever more hardscaped into the staging point for trains and trucks carrying goods from the ports of Los Angeles and Long Beach to the rest of the nation.



Bud Bosch, 58, at Bosch Dairy in Ontario. (Irfan Khan / Los Angeles Times)

There are 170 million square feet of warehouses planned or under construction in the Inland Empire, according to a recent report by environmental groups. And despite fears of a recession, demand hasn't ebbed.

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But the rapid transformation of semirural areas into barrens of concrete tilt-up "logistic parks" is encountering a backlash. Residents are questioning whether they want the region's economy, health, traffic and general ambiance tied to a heavily polluting, low-wage industry that might one day pick up and leave as global trade routes shift.

Several Inland Empire cities, including Colton and Norco, have placed building moratoriums on warehouses, as has Pomona, which borders the region. Environmental groups are pushing Gov. Gavin Newsom to declare a state of emergency, hoping to keep new warehouses away from homes and schools, where heavy truck traffic can expose children to high levels of toxic diesel emissions that have been linked to respiratory illness.

"Warehouse-induced pollution has created a state of environmental injustice and a public health crisis in San Bernardino and Riverside counties," dozens of labor, environmental and community groups said in a letter last month urging Newsom to implement a regionwide moratorium on warehouses.



Trucks parked at a Walmart distribution center in Eastvale. (Robert Gauthier / Los Angeles Times)

The group accused local politicians of environmental racism, ignoring health impacts while collecting donations from developers and their allies.

A spokesperson for Newsom said in an email to The Times that "California is taking urgent action to clean the air in communities hardest hit by pollution," pointing to the governor's order requiring heavy-duty truck manufacturers to transition to zero-emission vehicles by 2045. She did not say whether the governor supports a moratorium.

Local officials like San Bernardino County Supervisor Curt Hagman argue that a halt to building could have grave consequences.

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"Lately, critics have called for warehouse moratoriums or outright bans. Their misguided proposals gloss over the real-world and draconian impact their potential bans would have on supply chains in local communities and the entire region," he wrote in an opinion piece in the San Bernardino news outlet the Sun. "If we fail to keep pace with the growing demand for additional warehouse space, the result will be immediate and far-reaching throughout the Inland Empire — loss of good-paying jobs, less affordable housing, fewer environmental benefits and community infrastructure improvements, not to mention the gains other jurisdictions will make at our expense."

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On a corner of the Bosch farms, cows lie in the shade of eucalyptus trees. The area was once largely an agricultural zone that has given way over the last decade to home tracts and warehouses. Heavy trucks have cracked the asphalt streets.

"We don't even take the street anymore," said Bosch, pointing to a road that leads to his family's ranch home, where his son and grandchildren now live. He said it's too dangerous.



An Amazon truck negotiates a sharp turn on Schaefer Avenue near Bosch Dairy. (Irfan Khan / Los Angeles Times)

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"The trucks, they don't watch out. They think it's a dead street."

In Ontario, there are an estimated 95,000 daily truck trips — nearly two for every household.

More warehouses, more trucks

A sampling of cities where warehouse growth has attracted more trucks, adding more pollution.

Cities	Number of warehouses	Daily truck trips
Los Angeles	808	48,000
Ontario	664	95,000
Fontana	325	53,000
Rancho Cucamonga	2...	32,...
Riverside	2...	35,0...
San Bernardino	2...	34,...
Moreno Valley	85	31,...

Truck trips are estimated based on a rate of 0.67 trips per 1,000 square feet of warehouse floor space.

Warehouse City data from Dec. 28, 2022

LOS ANGELES TIMES

At one point, Bosch sought to expand his dairy farm, but the warehouse economy has become so pervasive that it priced him out.

"I asked one guy if I could rent his dairy, and he said, 'Nah, why put up with the hassle of you renting?'" Bosch recalled, adding that owners earn more selling parking space. "The income from truck parking is lucrative."

The logistics industry has moved into a void left as higher-wage jobs in manufacturing, defense and aerospace disappeared, converting largely agricultural and vacant land into the hub of America's retail economy. The industry added more jobs in the Inland Empire than in any other part of the state. In 2022, it created 24,400 jobs in the area; in 2021, it created 27,400, according to John Husing, an economic consultant who specializes in logistics in the Inland Empire. Median wage ranges from $18.57 an hour for warehouse workers to $24.93 for drivers, he said.

"This is a job generator like mad," he said. "Amazon has more than a dozen facilities out here. When the pandemic hit and people could not buy services, they converted to buying stuff, and a lot of that was done online. That really increased employment in the logistics out here, and it has held ever since."

During the height of the pandemic, ecommerce made up 16% of U.S. retail sales, according to government data. Employment in the logistics industry was 51% higher at the end of last year than in February 2020, according to Southern California Assn. of Governments.

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Amazon and FedEx big rigs pass a neighborhood en route to warehouses in Jurupa Valley in Riverside County. (Gina Ferazzi / Los Angeles Times)

Truck drivers delivered every type of consumer good imaginable from the seaports and airports, as workers in the warehouses unloaded, sorted and reloaded them onto intermodal containers to be hauled by train and long-haul tractor-trailers across the deserts.

UPS and FedEx have Southern California regional operations in Ontario International Airport, Husing noted, which has become one of the nation's fastest-growing cargo hubs. Amazon is the region's largest private employer.

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But other economists say many of those jobs don't pay close to a living wage. The median hourly pay in the region is almost $5 below the California average, and turnover is high because of the grueling, nonstop work.

"Even with this impressive growth in the Inland Empire, logistics-sector jobs are generally lower-paying jobs, and they're at very high risk of automation," said Gigi Moreno, an economist at the Southern California Assn. of Governments. "You have automation and artificial intelligence in the logistics sector displacing workers, which

means that the industry may not be able to support as many jobs as we do today. And this is even before considering any of the moratoriums on building warehousing. This is just the nature of what's going on in the sector."

The changes have strained communities. Many warehouses are built in low-income areas, where residents must put up with the traffic and pollution.



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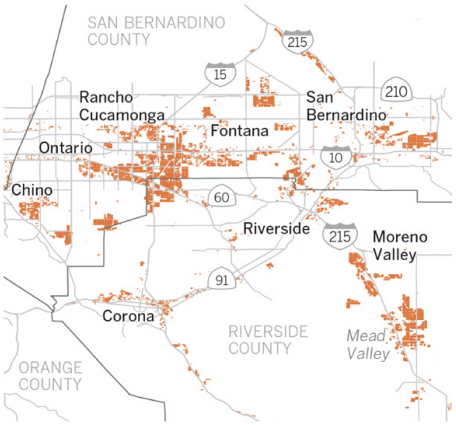
When your house is surrounded by massive warehouses

Oct. 27, 2019

When the San Bernardino County Board of Supervisors met to vote on a project to rezone a semirural neighborhood in Bloomington for a massive warehouse complex, dozens of residents, activists and union construction workers came to speak passionately for and against it.

Warehouse growth

The growth of warehouses has averaged about 50 million square feet of space a year over the last five years. In the last 10 years, more than 90% of the growth was in Riverside and San Bernardino counties, the Warehouse City tool reveals.



Warehouse City Lorena Elebee / LOS ANGELES TIMES

The board unanimously approved it, allowing the developer, Howard Industrial Partners, to build a warehouse and distribution space the size of 56 football fields. To make room, the school district agreed to relocate Zimmerman Elementary.

Environmental justice and conservation groups sued the county for neglecting to properly analyze the potential environmental damage. When operational, their lawyers argue, the complex would add thousands of diesel truck trips daily — on top of the truck traffic already choking the area. The lawsuit is pending, but families have agreed to sell their homes to make way for the new buildings.

"Development is creating an employment base and is an economic driver," said Tim Howard, a founding partner of Howard Industrial Partners. He said warehouse projects have "transformed cities" like Fontana, providing employment opportunities and raising the quality of life.

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Diesel truck traffic has increased with the addition of warehouses, causing more air pollution in the Southland. (Gina Ferazzi / Los Angeles Times)

But smog in the Inland Empire — largely caused by big-rig exhaust — is the worst in the nation, according to the the American Lung Assn.

Last year, California Assembly Majority Leader Eloise Gómez Reyes (D-Grand Terrace) introduced legislation that would have required a 1,000-foot buffer zone between new warehouses and homes, schools, day-care centers, playgrounds and other areas where people gather.

"If you're concerned about the health of the community, you're not going to build a warehouse with diesel trucks coming in and out, spewing diesel particulate matter right next to the schools or right next to the homes," she said.

The bill also tacked on labor requirements for new structures.

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But it faced opposition from a wide array of business groups and local municipalities. Hagman, then the chair of the San Bernardino County Board of Supervisors, opposed

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the legislation, writing to state Senate committee members that it "erodes local land use authority" and could put the county at a competitive disadvantage.

Reyes pulled the proposal after a state Senate committee sought to replace the setback provision with a one-year ban on warehouse construction, a move she felt went too far and would cause further polarization.

"I've never been anti-warehouse," she said. "If in each of our cities and in each of our counties, if they did the planning of the communities in a responsible way, we wouldn't be dealing with this, right?

"You could still have the warehouses," she added, "but they would be planned in places where they're not next to the homes. They're not next to the schools. They're not next to the day-care centers."

Critics say that for too long, local governments have been part of the problem, rubber-stamping the projects and ignoring state environmental laws and the progressive damage that warehouses have caused communities.

There is "a very weak and minimal analysis" of the environmental damage distribution centers have wrought, said Susan Phillips, director of the Robert Redford Conservancy for Southern California Sustainability. Working with Radical Research, a consulting group specializing in atmospheric pollution, the conservancy released a mapping tool, "Warehouse City," that shows the breadth of industry in the region overlaid with estimated truck trips generated and public data on pollution.

The environmental impact reports that are required by the state, she said, "are supposed to account for cumulative impacts, but they're rarely adequate."

The tool shows that the region has roughly 4,000 warehouses covering more than 1.5 billion square feet, including parking lots. More than 300 warehouses are 1,000 feet or less from 139 schools.

"The number of warehouses and the square footage of warehouses is mind-boggling," she said.

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Thirty years ago, there were 1,600 warehouses in the region, creating 140,000 truck trips daily, said Mike McCarthy, who runs Radical Research. The mapping found that the industry now generates more than half a million daily truck trips — nearly four times the diesel traffic as the population has almost doubled. The researchers also found that the average warehouse 30 years ago was about half the size of those built today, which average 500,000 square feet.

"They are running out of space; they are starting to go into the high desert, Imperial Valley and even the Central Valley," Phillips said. "But they're not stopping putting warehouses next to homes and schools in the Inland Empire. The amount of space they are using is leaving little space for anything else."

The diesel trucks that serve warehouses spew out a cocktail of pollutants, including particulates that lodge in human lungs. Studies have linked the pollution to asthma, decreased lung function in children and cancer.



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Southern California warehouse boom a huge source of pollution. Regulators are fighting back

May 5, 2021

"We know diesel exhaust is a killer," said William Barrett, national senior director of clean air advocacy for the American Lung Assn. "It's one of the most damaging things that your lungs can experience."

The rise in pollution and fears over climate change have pushed California air regulators to seek to ban the sale of diesel big rigs by 2040. In Southern California, regulators are attempting to limit emissions from warehouses.

Atty. Gen. Rob Bonta said he has been monitoring warehouse development across California for compliance with environmental rules.

"For too long, warehouses have proliferated throughout California with little consideration for the health and safety impacts on the surrounding communities," he said in an emailed statement. "As a result of these poor land use decisions, many low-income communities and communities of color continue to be among the most pollution burdened in the state."

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An Amazon warehouse is visible from Bosch Dairy. (Irfan Khan / Los Angeles Times)

Around the Bosch property in Ontario, much of what was once a capital of America's dairy farms is now the nation's capital of warehouses. There are more than 600 in the city, which has a population of 178,000. Dusty pastures disappeared as farmers fled to Texas, South Dakota and other states, and stately ranch homes became makeshift repair shops for big rigs.

"With COVID-19 and Amazon being like a superpower, you know, the warehouse craze just went crazy around here," Bosch said. "I guess it's progress, you know. I don't like it so much."

The market is so hot for warehouses that they are leased before they are even built, said Eloy Covarrubias, an investment broker at CBRE, specializing in industrial property. He estimates that there are between 38 million and 39 million square feet under construction — and more than half is already leased.

"There has been a significant amount of pent-up demand for that space," he said, noting that the vacancy rate is about 1%.

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That has cost the Inland Empire its agricultural roots, said Amparo Muñoz, former policy director at the Center for Community Action and Environmental Justice, a Jurupa Valley group that has been fighting warehouse development and signed the letter to Newsom.

Muñoz didn't start off as an environmentalist. A trained engineer, she spent some of her time in warehouses checking and maintaining equipment.

"I really believed that if you let businesses regulate themselves, they do the right thing," she said.

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Her ideas changed after she had her second child. She had moved to Fontana a few years before, to a tract of homes surrounded by fields. She loved the pastoral life, the agricultural clubs and bunny farms. But by the time she was pregnant in 2013, an Amazon warehouse had been built less than two blocks from her home.

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"At first you are like, hey, it's not too bad," she said.

She walked daily along the perimeter of her neighborhood to stay fit while pregnant, but what she thought were allergies worsened until she couldn't breathe.

"The doctor asked me how long I had had asthma, and I was like 'What? I don't have asthma.'"

She learned that she had developed the condition in her 30s. Her son was born with asthma and had to have a breathing mechanism for the first year of his life.

"They told me it was environmental factors," she said. "I didn't think about all the trucks that were idling at the warehouse when I was walking by them."

The family spent around $22,000 to install high-grade air filters and a new duct system in their home.

"A lot of time, kids wake up with bloody noses on their pillows," she said. "We have the worst air quality. We have gridlock. We have streets and communities that were

never built for global logistics. We're basically building, on top of failed infrastructure, a global network."

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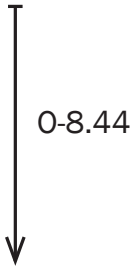
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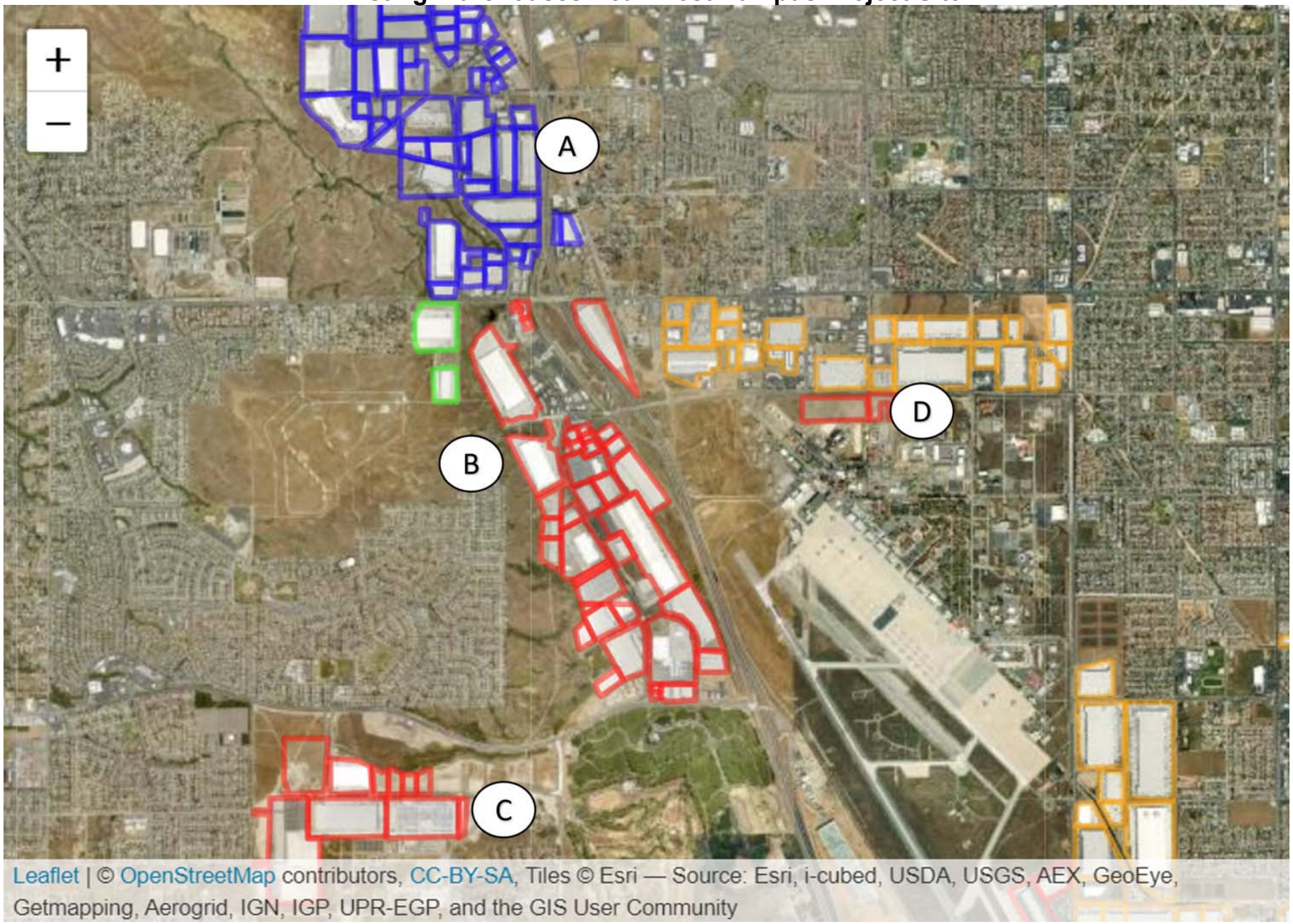
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APPENDIX C

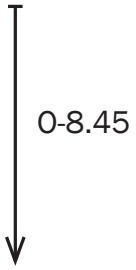


Existing Warehouses Near West Campus Project Site



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APPENDIX D



SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is entered into as of the date on which the last signatures have been affixed hereto ("Effective Date"), by and between, Center for Community Action and Environmental Justice, Center for Biological Diversity, Coalition for Clean Air, Sierra Club, and San Bernardino Valley Audubon Society (collectively, "Petitioner Parties"), and Highland Fairview Properties, HF Properties, Sunnymead Properties, Theodore Properties Partners, 13451 Theodore, LLC, and HL Property Partners (collectively, "Highland Fairview"), and each of them, which are referred to cumulatively as the "Parties" or singularly as a "Party."

RECITALS

WHEREAS, Highland Fairview is the applicant for a master-planned development project encompassing the development of up to 40.6 million square feet of building area and all necessary infrastructure to support large-scale logistics operations ("World Logistics Center Project") located on approximately 2,610 acres of largely vacant land south of State Route 60 and north of the San Jacinto Wildlife Area in the Rancho Belago area of the City of Moreno Valley ("Property");

WHEREAS, in August 2015, the City of Moreno Valley ("City"), through its City Council, approved the World Logistics Center Project and certified a final environmental impact report ("FEIR") pursuant to the California Environmental Quality Act ("CEQA");

WHEREAS, the City's August 2015 approval of the World Logistics Center Project consisted of (a) a Specific Plan to govern the World Logistics Center Project's development ("Specific Plan"); (b) an amendment to the City's General Plan ("General Plan Amendment"); (c) an amendment to the Property's zoning ("Zone Change"); (d) a tentative parcel map to subdivide a 1,539-acre portion of the Property; (e) an annexation request; (f) off-site improvements; and (g) a development agreement to vest the underlying approved land use entitlements ("Development Agreement");

WHEREAS, on September 23, 2015, the Petitioner Parties commenced litigation in the Riverside County Superior Court, captioned *Center for Community Action and Environmental Justice, et al.* v. *City of Moreno Valley, et al.* (Case No. RIC1511327), challenging the City's approval of the World Logistics Center Project ("FEIR Litigation");

WHEREAS, in November 2015, the City Council directly adopted three initiatives for the World Logistics Center Project: (a) the Land Use and Zoning Entitlements Initiative to repeal and replace the City's approval of the Specific Plan, General Plan Amendment, and Zone Change with a substantially similar set of entitlements; (b) the World Logistics Center Land Benefit Initiative to repeal and replace the City's annexation request; and (c) the Development Agreement Initiative to approve a Development Agreement substantially similar to that previously adopted by the City (collectively, "Initiatives");

WHEREAS, on February 22, 2016, the Petitioner Parties commenced litigation in the Riverside County Superior Court, captioned *Center for Community Action and Environmental Justice, et al.* v. *City of Moreno Valley, et al.* (Case No. RIC1602094), challenging the City's adoption of the Initiatives ("Initiatives Litigation");

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WHEREAS, in February 2018, in the FEIR Litigation, the Riverside County Superior Court ordered the City to set aside its certification of the FEIR and approvals of the World Logistics Center Project to make changes to the FEIR's analysis of energy, biological, noise, agricultural resources, and cumulative impacts;

WHEREAS, in the FEIR Litigation, Petitioner Parties appealed the Riverside County Superior Court's decision upholding the FEIR's GHG analysis and Highland Fairview cross-appealed the Superior Court's finding that the FEIR violated CEQA in five respects;

WHEREAS, in August 2018, in the Initiatives Litigation, the Court of Appeal directed the Riverside County Superior Court to issue a writ of mandate ordering the City to set aside the Development Agreement Initiative and vacate its approval of the Development Agreement;

WHEREAS, in a revised final EIR, the City addressed the matters that the Riverside County Superior Court ordered be changed in its February 2018 ruling in the FEIR Litigation and also analyzed new information pertaining to potential air quality, greenhouse gas emissions, and energy impacts ("Revised Final EIR");

WHEREAS, on June 16, 2020, the City Council (a) approved Resolution No. 2020-47, certifying the Revised Final EIR for the World Logistics Center Project and denying the appeal of the City Planning Commission's certification of the Revised Final EIR; (b) approved Resolution No. 2020-48, approving Tentative Parcel Map No. 36457 for Finance and Conveyance Purposes Only ("Parcel Map") and denying the appeal of the City Planning Commission's approval of the Parcel Map, and (c) introduced Ordinance No. 967, approving a new Development Agreement;

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Cont.

WHEREAS, on July 7, 2020, the City Council conducted a second reading of and adopted Ordinance No. 967, approving the new Development Agreement;

WHEREAS, on July 17, 2020, the Petitioner Parties commenced litigation in the Riverside County Superior Court, captioned *Center for Community Action, et al. v. City of Moreno Valley, et al.* (Case No. RIC2002697), challenging the City's adoption of Resolution Nos. 2020-47 and 2020-48, certification of the Revised Final EIR, and adoption of Ordinance No. 967 ("RFEIR Litigation");

WHEREAS, on July 16, 2020, related litigation was commenced in the Riverside County Superior Court, captioned *Golden State Environmental Justice Alliance, et al. v. City of Moreno Valley, et al.* (Case No. RIC2002675) ("Golden State Litigation"); and on or about March 8, 2021, petitioner Golden State Environmental Justice Alliance filed a request to dismiss with prejudice the Golden State Litigation;

WHEREAS, on or about July 17, 2020, further related litigation was commenced in the Riverside County Superior Court, captioned *Paulek, et al. v. City of Moreno Valley. Et al.* (Case No. RIC2002672) ("Paulek Litigation");

WHEREAS, on or about November 9, 2020, the Riverside County Superior Court consolidated the FEIR Litigation with the RFEIR Litigation, Golden State Litigation, and Paulek Litigation;

WHEREAS, in November 24, 2020, the Court of Appeal dismissed the appeal and cross-appeal in the FEIR Litigation as moot and issued a remittitur on January 26, 2021; and

WHEREAS, the purpose of this Agreement is to settle all disputes between the Petitioner Parties and Highland Fairview arising out of or related to the World Logistics Center Project, including without limitation, the FEIR Litigation and the RFEIR Litigation.

AGREEMENT

NOW, THEREFORE, in consideration of the mutual covenants, promises and undertakings set forth herein and other consideration, the receipt and adequacy of which the Parties hereby acknowledge, the Parties agree as set forth below.

1. The Parties' Obligations.

a. Highland Fairview's Obligations.

i. Highland Fairview shall take all actions required of it in this Section 1(a) provided that the Petitioner Parties have met the obligations set forth in Section 1(b) below and upon the earlier of:

1. the commencement of grading for the World Logistics Center Project; or

2. (a) the full and final resolution of the Paulek Litigation and the FEIR Litigation in the City's and Highland Fairview's favor or (b) in the event Highland Fairview has not prevailed in the Paulek Litigation and/or FEIR Litigation, the City reapproves the World Logistics Center Project and all applicable statutes of limitation have passed with no litigation filed or, if such future litigation ("Future Litigation") is filed, that such Future Litigation is resolved in the City's and Highland Fairview's favor and is no longer pending in any court.

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ii. *Greenhouse Gas Emissions and Air Quality*. Highland Fairview shall ensure that all actions required in Attachment A hereto are carried out.

iii. *Biological Resources*. Highland Fairview shall ensure that all actions required in Attachment B hereto are carried out.

iv. *Community Benefits.* Highland Fairview shall ensure that all actions required in Attachment C hereto are carried out.

v. *Attorneys' Fees.* Within seven (7) days after the conditions set forth in Section 1(b)(i) are satisfied, Highland Fairview shall pay the Petitioner Parties' attorneys' fees and costs from the RFEIR Litigation, including reasonable attorneys' fees accrued in connection with negotiating this Agreement, in the amount of $595,000 by ACH deposit, wire transfer, or a check. Petitioners will provide deposit information to Highland Fairview.

vi. *Compliance Reporting*. Each year for a period of fifteen (15) years, commencing on the first anniversary of the Effective Date of this Agreement, and every five (5) years thereafter until the World Logistics Center Project is fully constructed or Highland Fairview's obligations under this Agreement are fully satisfied, whichever condition is satisfied first, Highland Fairview shall provide to the Petitioner Parties a detailed report describing how Highland Fairview has complied with Sections 1(a)(ii)-(iv) above ("Annual Compliance Report"). For a period of thirty (30) days from receipt of the Annual Compliance Report, the Petitioner Parties may request clarification or reasonable additional information from Highland Fairview to verify Highland Fairview's compliance. Highland Fairview shall provide such additional requested information that is within its possession, custody, or control within thirty (30) days after receipt of such request. Any disputes over compliance with the Sections 1(a)(ii)-(iv) above shall be resolved pursuant to Section 2 below.

vii. *Technological and Methodological Progress*. The Parties recognize that technologies and methodologies are likely to progress over time and, due to that, it may be that the technological and methodological specificity in this Agreement could become obsolete or outdated in the future. In that event, Highland Fairview may implement such newer technologies or methodologies provided that such technologies or methodologies achieve at least as much environmental protection and do not result in new or greater significant environmental impacts than the technologies or methodologies specified in this Agreement. At least 90 days prior to implementing any alternative technology or methodology, Highland Fairview shall meet and confer with Petitioner Parties concerning the implementation of such alternative technology or methodology. Any dispute regarding whether the proposed alternative technology or methodology meets the standards in this Section 1(a)(vii) shall be resolved by arbitration pursuant to the procedures in Section 2 of this Agreement.

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viii. Nothing in this Agreement shall prevent Highland Fairview and/or World Logistics Center Project tenants from using the obligations under this Agreement also to satisfy any obligation imposed by laws or regulations, whether they be enacted before or after the Effective Date.

b. Petitioner Parties' Obligations.

i. *Pending Litigation.* With respect to the RFEIR Litigation and the FEIR Litigation, the Petitioner Parties shall, within seven (7) days after the Effective Date, take all actions necessary to dismiss with prejudice all Petitioner Parties' claims in the RFEIR Litigation and the FEIR Litigation and through their respective counsel shall take all actions required to ensure compliance with this Section 1(b)(i).

ii. *Non-Opposition*. Provided that Highland Fairview is in compliance with this Agreement, as enforced pursuant to Section 2 below, the Petitioner Parties shall not Oppose the World Logistics Center Project, as detailed below.

1. Previously Issued Approvals. Petitioner Parties shall not Oppose any Approvals issued on or before the Effective Date by any Governmental Authority that are or may be necessary, useful, or convenient for the completion of any portion or aspect of the World Logistics Center Project ("Previously Issued Approvals"). "Approval" or

"Approvals" shall mean in this Agreement any permits, approvals, entitlements, voter initiatives, development agreements, legislative actions, and/or allowances of any sort whatsoever, including any and all environmental clearances, together with any mitigation measures or the implementation thereof. "Governmental Authority" shall mean in this Agreement any federal, state, regional, local, or other governmental entity, body, branch, bureau, official, special district, department, court, or other tribunal, or any other governmental or quasi-governmental authority, including the electorate, exercising or entitled to exercise any administrative, executive, judicial, legislative, police, regulatory, or land use authority or power over the World Logistics Center Project.

2. Future Implementation Approvals.

a. Petitioner Parties shall not Oppose any Approvals applied for, sought, or issued after the Effective Date by any Governmental Authority that is or may be necessary, useful, or convenient for the completion of any portion or aspect of the World Logistics Center Project ("Future Implementation Approvals"); provided, however, that such Future Implementation Approvals do not: (a) amend the Specific Plan; (b) amend the Initiatives; or (c) eliminate, reduce, or amend a mitigation measure in the Final Revised EIR in a manner that increases environmental impacts. Notwithstanding the foregoing, Petitioner Parties are free to take any action permitted under Section 1(b)(ii)(4) of this Agreement.

b. The Petitioner Parties also understand and acknowledge that the World Logistics Center Project is being challenged in the Paulek Litigation and the FEIR Litigation. Should the World Logistics Center Project be required to be reconsidered, the Petitioner Parties shall not Oppose approval of the World Logistics Center Project, including without limitation its CEQA document with any provisions or mitigation measures then needed provided they do not contradict, interfere with, or reduce any of Highland Fairview's commitments in this Agreement.

0-8.45 Cont.

3. Meaning of "Opposition." "Opposition," "Oppose," or "Opposing" means (a) opposing, challenging, or seeking to hinder, whether by litigation, public opposition at any proceeding before a government agency, public testimony, comments, or petition to government authorities, a Previously Issued Approval or Future Implementation Approval, or (b) providing funding for others to file or maintain litigation opposing, challenging, or seeking to hinder a Previously Issued Approval or Future Implementation Approval. A Petitioner Party shall be deemed to be Opposing a Previously Issued Approval or a Future Implementation Approval if its board of directors, officers, or staff, or as to the Sierra Club, in addition to the above-listed persons, the Sierra Club's San Gorgonio Chapter's Board of Directors, officers, staff, group representatives, delegates, and any individual expressly representing or directed to represent the Sierra Club's interests, Oppose such Previously Issued Approval or Future Implementation Approval. The Sierra Club's San Gorgonio Chapter shall advise its staff and volunteer leaders that the Sierra Club has resolved its dispute with Highland Fairview and of the Sierra Club's obligations under this Agreement, particularly non-Opposition set forth above. In the event that a member or members of the Sierra Club Oppose(s) a Previously Issued Approval or Future Implementation Approval, the Sierra Club agrees to disavow publicly said Opposition, via letter or other appropriate means, upon reasonable request by Highland Fairview, in any proceedings involving the Previously Issued Approval or Future

Implementation Approval before the City of Moreno Valley or any other agency or court having jurisdiction over the World Logistics Center Project. Such statement shall provide that the member or members do not represent the Sierra Club's position concerning the World Logistics Center Project. Opposition, Oppose, or Opposing does not include any action permitted under Section 1(b)(ii)(4) of this Agreement.

4. Governmental Actions of General Applicability. Petitioner Parties are not prohibited from commenting on, supporting, and/or Opposing proposed actions by any Governmental Authority that is generally applicable and not directly related to the development of the World Logistics Center Project, the Previously Issued Approvals, or Future Implementation Approvals, even though such proposed agency actions may have an impact on the World Logistics Center Project, the Previously Issued Project Approvals, and/or Future Implementation Approvals due to the general applicability of such proposed actions by any Governmental Authority. Examples of governmental actions of general applicability that Petitioner Parties are free to comment on, support and/or Oppose include, but are not limited to rules promulgated by local air district related to emissions; regulations promulgated by California agencies related to emissions; approvals for regional transportation plans; approvals of urban water management plans; listing decisions for threatened and endangered species; and the regulation of industrial equipment.

c. Mutual Releases of Claims.

i. Except as otherwise provided in this Agreement, the Petitioner Parties each release Highland Fairview, its affiliates, subsidiaries, parent entities, and each of their respective employees, officers, members, staff, agents, attorneys, and/or representatives, and each of them (collectively, the "Highland Fairview Released Parties"), from any and all claims, lawsuits, administrative and judicial proceedings, appeals, demands, challenges, liabilities, damages, fees, costs, and causes of action, at law or in equity, known or unknown, in any jurisdiction and before any court, agency, or tribunal (collectively and severally, "Claims") that the Petitioner Parties ever had, have, or may have against the Highland Fairview Released Parties, or any of them, arising in any way from or related in any way to the World Logistics Center Project, including without limitation, the claims brought by, or that could have been brought by Petitioner Parties in the RFEIR Litigation and the FEIR Litigation.

O-8.45 Cont.

ii. Highland Fairview releases the Petitioner Parties, their affiliates, subsidiaries, parent entities, and each of their respective employees, officers, members, staff, agents, attorneys, and/or representatives, and each of them (collectively, the "Petitioner Released Parties") from any and all Claims that Highland Fairview ever had, have, or may have against the Petitioner Released Parties, or any of them, arising in any way from or related in any way to the World Logistics Center Project, including without limitation, the RFEIR Litigation and the FEIR Litigation.

iii. Nothing in this Section shall be interpreted as releasing any Party's right to enforce this Agreement in full.

2. Enforcement.

a. *Meet and Confer*. In the event of any dispute between the Parties related to this Agreement or the World Logistics Center Project, the Parties shall, before taking any other action concerning that dispute, provide written notice of the dispute to the other Party and meet and confer in person in a good-faith effort to resolve the dispute within thirty (30) days of the notice, unless otherwise agreed. Any Party that is alleged to be in breach of this Agreement shall have thirty (30) days from that in-person meeting to cure, unless otherwise agreed. Notwithstanding the foregoing, if the dispute is deemed to be a time-urgent matter by Highland Fairview or at least two of the five Petitioner Parties, these time periods may be disregarded and the Parties may seek immediate review by an arbitrator within twenty-four (24) hours' notice to the allegedly breaching Party pursuant to JAMS's Comprehensive Arbitration Rules and Procedures, including Rule 2(c), as those Rules exist on the Effective Date. If the allegedly breaching Party cures or begins a good faith effort to cure the alleged breach, any such proceeding previously commenced pursuant to the alleged time-urgent matter shall be dismissed.

b. *Nonbinding Mediation.* In the event any such dispute is not resolved pursuant to Section 2(a), then at any Party's request the Parties may participate in non-binding mediation of any dispute related to this Agreement or the World Logistics Center Project. This obligation shall take place in a timeframe that is reasonable under the circumstances. Any such mediation is to be completed in one day and not to exceed a total of eight (8) hours, unless extended by mutual consent. If nonbinding mediation is used pursuant to this section, Highland Fairview shall pay for the costs of mediation. The mediator will be selected by mutual agreement.

0-8.45 Cont.

c. *Binding Arbitration*. In the event any such dispute is not resolved pursuant to Section 2(a) or Section 2(b), then within fifteen (15) days after the conclusion of the meet and confer or non-binding mediation, at Highland Fairview's request or the request of no fewer than two of Petitioner Parties the Parties shall participate in final, binding, and non-reviewable arbitration of any dispute related to this Agreement or the World Logistics Center Project, pursuant to the provisions below.

i. The dispute brought under Section 2(c) shall be determined by arbitration before three arbitrators, each of whom shall be a retired jurist. The arbitration shall be administered by JAMS pursuant to its Comprehensive Arbitration Rules and Procedures and in accordance with the Expedited Procedures in those Rules as those Rules exist on the Effective Date, including Rules 16.1 and 16.2. The determination may be entered in any court having jurisdiction solely for the purposes of enforcing the determination.

ii. Within ten (10) days after notice under Section 2(c) is provided, Highland Fairview shall select one person to act as arbitrator and the Petitioner Parties shall select another. The two so selected shall select a third arbitrator within fifteen (15) days of the commencement of arbitration. If the arbitrators selected by the Parties are unable or fail to agree upon the third arbitrator within the allotted time, the third arbitrator shall be appointed by JAMS in accordance with its rules. All arbitrators shall serve as neutral, independent, and impartial arbitrators. Highland Fairview and the Petitioner Parties shall communicate their choices of a

Party-appointed arbitrator only to the JAMS Case Manager in charge of the filing. Neither is to inform any of the arbitrators as to which of the Parties may have appointed them.

iii. Any relief for an alleged breach of this Agreement shall be limited to any specific performance or injunctive relief necessary to ensure compliance with the provision of this Agreement that the complaining Party alleges another Party has breached. Such relief shall not be broader than necessary to ensure compliance with the provision of this Agreement that has been determined to have been breached.

iv. Highland Fairview shall be responsible for paying any fees and costs JAMS requires for JAMS to perform its arbitration services called for under this Section 2(c) unless the arbitrators determine that Petitioner Parties' commencement of arbitration was frivolous, unreasonable, or without foundation. If and only if the arbitrators determine that Petitioner Parties' commencement of arbitration was frivolous, unreasonable, or without foundation, then the Petitioner Parties who commenced that arbitration shall pay Highland Fairview one-half of JAMS's total fees and costs, such that each side will have paid one-half of JAMS's total fees and costs. Highland Fairview shall also not seek any security in connection with any Interim Measures that may be awarded under Rule 24 of JAMS's Comprehensive Arbitration Rules and Procedures.

v. Unless and only to the extent that an Arbitrator awards an Interim Measure, or other injunctive relief available under Rule 24 of JAMS's Comprehensive Arbitration Rules and Procedures pursuant to Section 2(c)(iii) of this Agreement, under no circumstances shall the pendency of arbitration delay or prevent Highland Fairview from obtaining any Future Implementation Approvals or developing the Property and operating the World Logistics Center Project in accordance with any Previously Issued Approvals and any Future Implementation Approvals.

O-8.45 Cont.

3. Agreement's Termination. All obligations under this Agreement shall terminate if the Property ceases operations as a logistics facility. In the event that a portion of the Property ceases operations as a logistics facility or is never developed as a logistics facility, then this Agreement shall terminate as to that non-logistics facility portion of the Property but shall remain in full force and effect as to the portion of the Property that is operating as a logistics facility.

4. Attorneys' Fees and Costs. Except as expressly provided elsewhere in this Agreement, the Parties shall bear their own attorneys' fees and costs in connection with the enforcement of this Agreement.

5. Naming and Branding. Highland Fairview shall have the right, in its sole and absolute discretion, to name any of the public benefits or funds created pursuant to Sections 1(a)(ii), (iii), and (iv) of this Agreement. Petitioner Parties shall not be in breach of this Agreement should they choose not to use the names selected by Highland Fairview when referring to the public benefits or funds provided in Sections 1(a)(ii), (iii), and (iv) of this Agreement.

6. No Admission of Liability. This Agreement is a compromise of disputed claims and the fact that the Parties hereto have determined to compromise such disputed claims by entering into this Agreement is not to be construed as an admission of liability or otherwise on the part of the Parties hereto.

7. Successors and Assigns. This Agreement is binding upon and inures to the benefit of each of the Parties and their respective representatives, heirs, devisees, successors and assigns.

a. Highland Fairview may, in its sole discretion, assign any or all of its rights, benefits, and obligations under this Settlement Agreement to any successor(s) in interest or to any purchaser, tenant, or end user of the World Logistics Center Project or any portion thereof. In the event of any such assignment(s), Highland Fairview shall ensure by written instrument that the assignee(s) shall be contractually obligated to comply with all of Highland Fairview's obligations under this Agreement for the Agreement's full term unless Highland Fairview expressly retains one or more such obligations itself. Such written instrument shall detail the specific rights, benefits, and obligations Highland Fairview is assigning and the specific rights, benefits, and obligations Highland Fairview is retaining for itself, if any, and that the assignee has accepted such assignment for the Agreement's full term or unless and until such assignee assigns such rights, benefits, and obligations pursuant to the terms of this Agreement to a subsequent assignee. Highland Fairview and any subsequent assignee upon assignment by it shall provide written notice to Petitioner Parties of any such assignment, reasonable evidence of the assignee's financial ability to fulfill the obligations assigned to it, and the assignee's acceptance by providing a copy of the fully executed written assignment instrument. No assignment, by Highland Fairview or by any subsequent assignee, shall be effective until such notice is provided. Upon delivery of such notice, Highland Fairview or the subsequent assignee shall be deemed released by Petitioner Parties from the obligations so assigned. Petitioner Parties may enforce any assigned obligations against the assignee(s) pursuant to Section 2 of this Agreement. Absent Petitioner Parties' written consent, which consent shall not be unreasonably withheld, no more than ten assignees at any given time shall hold any such assigned rights, benefits, and obligations under this Agreement.

O-8.45 Cont.

b. Upon the sale of the Property or any portion of the Property, Highland Fairview shall provide a complete copy of this Agreement to the purchaser as an attachment or exhibit to any purchase and sale agreement and shall provide proof of having done so to Petitioner Parties. Any purchase and sale agreement conveying the Property, or any portion of the Property also must include the purchaser's express acknowledgment of this Agreement.

c. Petitioner Parties shall not assign any or all of their rights, benefits, and obligations under this Agreement without prior written consent from Highland Fairview, which as to any assignment of rights and benefits only shall not be unreasonably withheld.

8. Entire Agreement. This Agreement: (a) constitutes the entire agreement between the Parties concerning the subject matter hereof, (b) supersedes any previous oral or written agreements concerning the subject matter hereof, and (c) shall not be modified except by a writing executed by the Party(ies) to be bound thereby.

9. Attachments. All attachments to this Agreement are incorporated herein by this reference.

10. Notices. All notices shall be in writing and shall be addressed to the affected Parties at the addresses set forth below. Notices shall be: (a) hand delivered to the addresses set forth below, in which case they shall be deemed delivered on the date of delivery, as evidenced by the written report of the courier service; (b) sent by certified mail, return receipt requested, in which case they shall be deemed delivered five (5) business days after deposit in the United States mail; or (c) transmitted by email in which case they shall be deemed delivered on the date of transmission if sent before 5:00 pm or on the first business day after transmission if sent at 5:00 pm or later or if sent on a Saturday, Sunday, or California court holiday, provided the Party transmitting notice by email does not receive a delivery status notification indicating that delivery of the email communication failed. Any Party may change its address, its email, or the name and address of its attorneys by giving notice in compliance with this Agreement. Notice of such a change shall be effective only upon receipt. Notice given on behalf of a Party by any attorney purporting to represent a Party shall constitute notice by such Party if the attorney is, in fact, authorized to represent such Party. The addresses and email addresses of the Parties are:

Parties	**Electronic and Mailing Address**
For Petitioner Parties: Center for Community Action and Environmental Justice, Center for Biological Diversity, Coalition for Clean Air, Sierra Club, and San Bernardino Valley Audubon Society.	Adriano Martinez Fernando Gaytan Earthjustice 707 Wilshire Blvd., Suite 4300 Los Angeles, California 90017 amartinez@earthjustice.org fgaytan@earthjustice.org Omonigho Oiyemhonlan Earthjustice 50 California Street, Suite 500 San Francisco, California 94111 ooiyemhonlan@earthjustice.org
For Petitioner Party: Sierra Club	Kevin P. Bundy Shute, Mihaly & Weinberger, LLP 396 Hayes Street San Francisco, California 94102 bundy@smwlaw.com With a copy to: Aaron Isherwood [Coordinating Attorney] Sierra Club 2101 Webster Street, Suite 1300 Oakland, California 94612 aaron.isherwood@sierraclub.org

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For Petitioner Party: Center for Biological Diversity	Aruna Prabhala Center for Biological Diversity 1212 Broadway, Suite 800 Oakland, California 94612 aprabhala@biologicaldiversity.org
For the Highland Fairview: Highland Fairview, HF Properties, Sunnymead Properties, 13451 Theodore LLC, Theodore Properties Partners, HL Property Partners, and ROES 21-40, inclusive.	James L. Arnone Benjamin J. Hanelin Latham & Watkins LLP 355 S. Grand Avenue, Suite 100 Los Angeles, California 90071 james.arnone@lw.com benjamin.hanelin@lw.com With a copy to: Iddo Benzeevi 14225 Corporate Way Moreno Valley, California 92553 iddo@highlandfairview.com

0-8.45 Cont.

11. Force Majeure. No Party shall be responsible or liable for any failure or delay in the performance of its obligations pursuant to this Agreement arising out of or caused by, directly or indirectly, forces beyond the Party's reasonable control, including, without limitation, fire, explosion, floods, acts of war or terrorism, national emergencies, pandemics, strikes, riots, and changes in laws or regulations.

12. Severability. In the event that any provision of the Agreement shall be held invalid or unenforceable, such holding shall not invalidate or render unenforceable any other provisions hereof unless any of the stated purposes of the Agreement would be defeated.

13. Incorporation of Recitals. The recitals contained herein are hereby incorporated by reference and are material and binding upon the Parties hereto.

14. Construction and Choice of Law. The terms of this Agreement are the product of arms-length negotiations between the Parties, through their respective counsel of choice, and no provision shall be construed against the drafter thereof. This Agreement shall be governed by and construed in accordance with the laws of the State of California. Any Party may enforce the terms of this Agreement pursuant to Section 2.

15. Counterparts. This Agreement may be executed in counterparts, by either an original signature or signature transmitted by facsimile or electronic transmission or other similar process, each of which shall be an original, but all of which taken together shall constitute one and the same instrument; provided, however, that such counterparts shall have been delivered to

the Parties (in person, by messenger, by overnight courier, by registered or certified mail, or by facsimile or electronic transmission).

16. Authority. Each signatory to this Agreement represents and warrants that he or she is authorized to sign this Agreement on behalf of the Party for which he or she is signing, and thereby to bind that Party fully to the terms of this Agreement.

[SIGNATURES ON NEXT PAGE]

O-8.45
Cont.

AGREED TO AND ACCEPTED AS OF THE EFFECTIVE DATE:

Petitioner Parties:

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

By: _____
Name: Ana Gonzalez
Title: Finance and Administration Director
Date: 4/28/2021

CENTER FOR BIOLOGICAL DIVERSITY

By: _____
Name: _____
Title: _____
Date: _____

COALITION FOR CLEAN AIR

By: _____
Name: _____
Title: _____
Date: _____

SIERRA CLUB

By: _____
Name: _____
Title: _____
Date: _____

SAN BERNARDINO VALLEY AUDUBON SOCIETY

By: _____
Name: _____
Title: _____
Date: _____

0-8.45
Cont.

AGREED TO AND ACCEPTED AS OF THE EFFECTIVE DATE:

Petitioner Parties:

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

By: _____
Name: _____
Title: _____
Date: _____

CENTER FOR BIOLOGICAL DIVERSITY

By: _____
Name: Aruna Prabhala
Title: Senior Atty & UW Program Dir.
Date: 4/28/2021

COALITION FOR CLEAN AIR

By: _____
Name: _____
Title: _____
Date: _____

SIERRA CLUB

By: _____
Name: _____
Title: _____
Date: _____

SAN BERNARDINO VALLEY AUDUBON SOCIETY

By: _____
Name: _____
Title: _____
Date: _____

0-8.45
Cont.

AGREED TO AND ACCEPTED AS OF THE EFFECTIVE DATE:

Petitioner Parties:

CENTER FOR COMMUNITY ACTION AND ENVIRONMENT

By: _____
Name: _____
Title: _____
Date: _____

CENTER FOR BIOLOGICAL DIVERSITY

By: _____
Name: _____
Title: _____
Date: _____

COALITION FOR CLEAN AIR

By: Joseph K. Lyou
Name: Joseph K. Lyou, Ph.D.
Title: President & CEO
Date: April 28, 2021

SIERRA CLUB

By: _____
Name: _____
Title: _____
Date: _____

SAN BERNARDINO VALLEY AUDUBON SOCIETY

By: _____
Name: _____
Title: _____
Date: _____

0-8.45
Cont.

AGREED TO AND ACCEPTED AS OF THE EFFECTIVE DATE:

Petitioner Parties:

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

By: _____
Name: _____
Title: _____
Date: _____

CENTER FOR BIOLOGICAL DIVERSITY

By: _____
Name: _____
Title: _____
Date: _____

COALITION FOR CLEAN AIR

By: _____
Name: _____
Title: _____
Date: _____

SIERRA CLUB

By: _____
Name: _____
Title: _____
Date: _____

SAN BERNARDINO VALLEY AUDUBON SOCIETY

By: _____
Name: _____
Title: _____
Date: _____

0-8.45
Cont.

AGREED TO AND ACCEPTED AS OF THE EFFECTIVE DATE:

Petitioner Parties:

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

By: _____
Name: _____
Title: _____
Date: _____

CENTER FOR BIOLOGICAL DIVERSITY

By: _____
Name: _____
Title: _____
Date: _____

COALITION FOR CLEAN AIR

By: _____
Name: _____
Title: _____
Date: _____

SIERRA CLUB

By: _____
Name: _____
Title: _____
Date: _____

SAN BERNARDINO VALLEY AUDUBON SOCIETY

By: Bradley C Singer
Name: Bradley C Singer
Title: President
Date: 04/28/2021

0-8.45 Cont.

Highland Fairview:

HIGHLAND FAIRVIEW PROPERTIES

By: _____
Name: Iddo Benzeevi
Title: President & CEO
Date: April 29, 2021

HF PROPERTIES

By: _____
Name: Iddo Benzeevi
Title: President & CEO
Date: April 29, 2021

SUNNYMEAD PROPERTIES

By: _____
Name: Iddo Benzeevi
Title: President & CEO
Date: April 29, 2021

THEODORE PROPERTIES PARTNERS

By: _____
Name: Iddo Benzeevi
Title: President & CEO
Date: April 29, 2021

13451 THEODORE, LLC

By: _____
Name: Iddo Benzeevi
Title: President & CEO
Date: April 29, 2021

0-8.45
Cont.

HL PROPERTY PARTNERS

By: _____
Name: Iddo Benzeevi
Title: President & CEO
Date: April 29, 2021

Approved as to form and content:

_____
Adriano Martinez
Counsel for Center for Community Action and Environmental Justice, Center for Biological Diversity, Coalition for Clean Air, Sierra Club, and San Bernardino Valley Audubon Society

_____
James L. Arnone
Counsel for Highland Fairview

0-8.45
Cont.

HL PROPERTY PARTNERS

By: _____
Name: _____
Title: _____
Date: _____

Approved as to form and content:

Adriano L. Martinez

Adriano Martinez
Counsel for Center for Community Action and Environmental Justice, Center for Biological Diversity, Coalition for Clean Air, Sierra Club, and San Bernardino Valley Audubon Society

_____

James L. Arnone
Counsel for Highland Fairview

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Cont.

Attachment A

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Cont.

Greenhouse Gas Emissions and Air Quality

1) ***Operational GHG and Criteria Pollutant Emissions Reduction Measures***

a) **Electric Truck and Car Grant Programs.**

i) **Heavy Duty Truck Grants.** WLC will provide funding for 500 grants for the purchase of Class 8 heavy duty electric trucks. The grants shall be provided pursuant to the attached table at Attachment A, Exhibit 1. The program shall prioritize applicants who will use the trucks in Moreno Valley and along the Highway 60 corridor, and will give special priority for drayage trucks that will be used in Moreno Valley and along the Highway 60 corridor. The grants will be phased proportionately with buildout of the first 35 million square feet of the project.

These heavy duty grants will include the following two conditions: (1) a prohibition on the resale of the electric truck to an entity that will operate trucks outside of California; and (2) 85% of the mileage must occur in the SCAQMD region and be enforced using a geo-fencing electronic system on each truck.

ii) **Medium Duty Truck Grants.** WLC will provide up to 60 grants for the purchase of Class 4 through Class 7 medium duty trucks. The grants shall be provided pursuant to the attached table at Attachment A, Exhibit 2. The program will prioritize (i) applicants who will use the trucks in Moreno Valley and along the Highway 60 corridor and (ii) Class 6 and 7 trucks. Only if there is no demand for the Class 6 and 7 truck classes shall grants be provided to Class 4 and 5 trucks with priority provided to Class 5 trucks over Class 4 trucks. The grants will be phased proportionately with buildout of the first 20 million square feet of the project.

These medium duty grants will include the following two conditions: (1) a prohibition on the resale of the electric truck to an entity that will operate trucks outside of California; and (2) 85% of the mileage must occur in the SCAQMD region and be enforced using a geo-fencing electronic system on each truck.

iii) **Local Delivery Truck Grants.** WLC will provide up to 120 grants for WLC tenants to purchase light-duty delivery vehicles (generally referred to Class 1, 2, and 3 trucks) for use for deliveries in Moreno Valley and the immediately proximate area. The grants shall be provided pursuant to the attached table at Attachment A, Exhibit 3. The program will prioritize (i) tenant applicants whose buildings are located closest to residential areas and (ii) the highest class of Class 1, 2, and 3 trucks and vehicles for which there is demand. The grants will be phased proportionately with buildout of the first 20 million square feet of the project.

These local delivery grants will include a condition that 50% of the mileage must occur in Moreno Valley and the Highway 60 corridor and be enforced using a geo-fencing electronic system on each truck.

iv) **Local Community Passenger Vehicle & Zero Emission Transportation Grants.** WLC shall (1) fund a $1,100,000 community clean vehicle grant program that will

0-8.45 Cont.

provide up to 1,000 $1,000 electric vehicle car grants to Moreno Valley residents and/or (2) fund other programs to advance zero emission transportation. Car grants for Moreno Valley residents shall be prioritized to households earning not more than 150% of the Area Median Income, as calculated by the U.S. Department of Housing and Urban Development. The grants will be phased proportionately with buildout of the first 20 million square feet of development of the project.

v) **Grant Programs Administration and Education.**

(1) The electric truck and electric car grant programs shall be administered by one or more mutually agreeable third party(ies).

(2) WLC shall fund the electric truck and electric car grant programs' reasonable administration costs separately from and in addition to the costs of the grants.

(3) The electric truck and electric car grant programs shall be phased proportionately with the project buildout terms identified in section 1(a), and funded upon or before the issuance of building construction permits for each warehouse building. If a building triggers a fraction of a grant, the grant number will be rounded up to the higher number.

(4) For all of the electric truck and electric car grant programs, the Parties shall meet and confer regarding any mutually agreeable opportunity to seek more deployment of zero emission trucks through the augmentation of these grant funds with other funding sources. The Parties may also meet and confer to address conditions of grants that may inhibit applicants from using the programs, including but not limited to resale requirements and geofencing in sections 1(a)(i), 1(a)(ii), and 1(a)(iii) above.

0-8.45 Cont.

(5) At five year intervals, parties will meet and confer to assess whether grants are being used within the particular classes identified in sections 1(a)(i), 1(a)(ii), and 1(a)(iii). The Parties may agree to shift grants to other classes of vehicles that may have demand. In the event that the number of qualified applications are insufficient to exhaust the number of truck grants made available within five years of the project's full buildout, then all remaining grant funds earmarked for a particular truck class may be redistributed to truck classes for which demand remains. In the event grant funds remain after this reallocation, then all unused funds shall be paid to a mutually agreeable third party for zero-emissions heavy-duty truck projects to benefit the residents of Moreno Valley and the communities along the Highway 60 corridor.

vi) **Electric Vehicle Advocacy Fund.** Upon the commencement of grading within the Specific Plan area, WLC shall pay $300,000 to a mutually agreeable third party entity selected by Petitioners to provide outreach, education, and training on zero-emissions vehicles and maintenance, with a focus on educating and training Moreno Valley residents about the electric truck and car programs provided for under this agreement.

b) **Maximize Onsite Solar.**

i) At a minimum, WLC shall do the following.

(1) WLC shall install the maximum amount of on-site rooftop solar generation permitted under the existing Moreno Valley Utility ordinance and other applicable law.

(2) If the existing Moreno Valley Utility ordinance is amended to allow additional onsite rooftop solar generation, and if that additional generation is approved by the Moreno Valley Utility and Southern California Edison and is allowed by other applicable law, then WLC shall install additional on-site rooftop solar generation at a cost of at least $1,650 per 10,000 square feet of warehouse floor area.

c) **Solar Advocacy Fund.** Upon the commencement of grading within the Specific Plan area, WLC shall provide $300,000 to a third-party, non-profit advocacy group or foundation that Petitioners shall select to advocate for a regional approach to encourage solar power generation and protect desert resources and greenfields.

d) **Lower Carbon Hydrogen Available Onsite.** If available under commercially reasonable terms, WLC will make available to tenants hydrogen fuel with a carbon intensity (CI) score of 50 or less. Hydrogen fuel will be made available upon the issuance of certificates of occupancy for 15 million square feet of logistics warehousing, or earlier, provided there is sufficient demand at that time to allow for a break-even price point or higher after the return of capital costs and ongoing operational expenses for the initial 5 years of operation, with a commercially reasonable income thereafter.

0-8.45 Cont.

e) **Onsite EV chargers**.

i) WLC will provide 1,000 Level 1 chargers in WLC parking lots, phased proportionately with project buildout, and will ensure that they function properly for at least 15 years from their dates of installation.

ii) WLC will provide 80 Level 2 chargers in WLC parking lots with two ports per charger (for a total of at least 160 ports), phased proportionately with project buildout, and will ensure that they function properly for at least 15 years from their dates of installation.

iii) WLC shall install signage at each EV parking space stating that the parking space is for EVs only and improperly parked vehicles will be towed.

2) ***Operational Air Quality (TACs)***

a) **Electrification/No Diesel/Alternative Fuels**

i) At least 90% of all forklifts must be powered by electricity, hydrogen, or non-fossil zero-emission fuels. No forklift may be powered by diesel fuels.

ii) 90% of all handheld landscaping equipment (e.g., leaf blowers, hedge trimmers, weed whackers, etc.) shall be electric or meet most current CARB standard within five years of the standard's implementation, to be enforced by including this requirement in all service contracts.

iii) Hot water heaters for office and bathrooms shall be powered either through solar cells mounted on the roofs of the buildings or solar-generated electricity.

iv) Only electric appliances shall be used in building office areas (e.g., electric stoves).

v) Diesel powered generators will be prohibited unless necessary due to emergency situations or constrained supply.

vi) All "yard goats," yard trucks, and hostlers will be powered by electricity or a non-diesel alternative.

b) **Auxiliary Power Unit (APU).**

i) All truck idling shall be limited to no more than 5 minutes.

ii) Each warehouse building shall provide an on-site air-conditioned lounge with a vending machine(s), a seating area, restrooms, workstations, shower facilities, and a television. The lounge shall be regularly maintained, cleaned, and stocked.

iii) WLC shall provide at least one APU plug-in for every 35 dock doors at multiple locations within the Specific Plan area where trucks park and signage shall be provided in English and Spanish identifying where such APU plug-ins are located.

0-8.45 Cont.

c) **Warehouse Construction**.

i) WLC shall construct all warehouse buildings to achieve at least LEED Silver Certification for core and shell. If the WLC seeks to advertise a building as having LEED Silver Certification, it shall apply for certification. If certification is granted, notice shall be provided to Petitioners.

ii) Warehouse roof areas not covered by solar panels shall be constructed with materials with an initial installation Solar Reflective Index Value of not less than 39.

d) **Cold Storage.** All transport refrigeration units (TRUs) shall have electric plug-ins and electrical hookups shall be provided at all TRU loading docks. WLC shall notify petitioners in writing before filing any applications for cold storage in warehouses.

3) ***Construction Emissions/Dust***

a) All construction equipment shall meet or be cleaner than Tier 4 standards, except if the construction contractor certifies that it is not feasible to use exclusively Tier 4 equipment due to limited availability. In all events, at least 80% of construction equipment shall meet or be cleaner than Tier 4 standards for the life of the project's construction.

b) In the event that diesel-powered construction equipment becomes available (1) with improved emission control devices that reduce particulate matter emissions, including fine particulate matter, and reduces NOx emissions, (2) at commercially reasonable prices, and (3) in sufficient quantities to be reasonably available, then WLC shall use such construction equipment.

c) No diesel-powered portable generators shall be used, unless necessary due to emergency situations or constrained supply.

d) No idling longer than five minutes shall be permitted.

4) ***Worker Education / Enforcement of Requirements***

a) See section 8(i) in Attachment C to this Agreement.

O-8.45
Cont.

Attachment A, Exhibit 1
Class 8, Heavy Duty Truck Grant Program

Truck Model Year	Grant ($) per Truck
2024	24,391
2025	23,523
2026	22,823
2027	22,228
2028	21,687
2029	21,198
2030 and later	20,709

Notes and Source: All assumptions are based on CARB data developed in the Advanced Clean Trucks rulemaking. Class 8 trucks are defined by Federal Highway Administration as trucks with Gross Vehicle Weight Rating (GVWR) of more than 33,000 lbs. The grants specified in this table equal the down payments projected to be required to purchase a Class 8 heavy duty electric truck for each specified truck model year, using the CARB Total Cost of Ownership Calculator available at: https://ww2.arb.ca.gov/sites/default/files/2019-05/190508tcocalc_2.xlsx. Consistent with industry practice, the down payment represents 10% of the amount due at the truck purchase, which includes the truck purchase price, the taxes and the registration (but not the fuel and maintenance).

O-8.45 Cont.

EV Heavy Duty Truck Grant

LATHAM & WATKINS LLP
WORLD LOGISTICS CENTER

Helping Truckers Transition to EV by Eliminating Up-front Cash Needed

Biggest Barrier to EV Truck Conversion?

- **Where does the buyer get the money for the down payment**

Solution: Zero Cash Down for Zero Emissions Grant Program

- WLC will provide Grant to cover the projected down payment on new HD EV truck based on CARB data
- Grant program will continue throughout the construction period

Class 8 Model Year	Purchase Price[1] (capital cost, registration, taxes)		Upfront Costs (capital cost, registration, taxes)				Benefits to Purchaser	
	Diesel (CARB)	Electric (CARB)	Diesel Down Payment[2]	EV Down Payment (CARB)[2]	WLC EV Truck Grant[3]	EV Down Payment (net of grant)	Day 1 Cash Savings to Switch to Electric[4]	Year 1 Fuel & Maintenance Savings vs Diesel[5]
MY 2024	$172,220	$243,913	($17,222)	($24,391)	$24,391	$0	$17,222	$5,850

1. Cost data for diesel and electric trucks estimated using the CARB TCO Calculator, available at: https://ww2.arb.ca.gov/sites/default/files/2019-05/190508tcocalc_2.xlsx. All assumptions are based on CARB data developed in the Advanced Clean Trucks rulemaking. The (lower) Tesla Semi price projections represent a less conservative scenario and accordingly the Tesla data was not used to set Grant levels.
2. Consistent with industry practice, the down payment represents 10% of the purchase price, tax and registration (but not fuel and maintenance).
3. The CARB price projections represent a conservative scenario and accordingly CARB data has been used to set Grant levels.
4. Incremental cost of EV Truck assumes no additional incentives or subsidies, which is highly conservative given the many existing EV subsidy programs. Note that no incentives are available for diesel trucks.
5. Annual maintenance and fuels costs (and savings) based on CARB data. This does not include revenues from the sale of LCFS credits.

Confidential Settlement Communication – Not for Dissemination

0-8.45 Cont.

Attachment A, Exhibit 2
Medium Duty Truck Grant Program

Truck Model Year	Grant ($) per Truck (Class 4-5)	Grant ($) per Truck (Class 6-7)
2024	8,466	13,040
2025	8,274	12,728
2026	8,118	12,476
2027	7,983	12,261
2028	7,859	12,065
2029	7,746	11,887
2030 and later	7,632	11,710

Notes and Source: All assumptions are based on CARB data developed in the Advanced Clean Trucks rulemaking. Federal Highway Administration (FHA) defines Class 4, Class 5, Class 6 and Class 7 trucks as trucks with GVWRs as follows: (i) Class 4 between 14,001 lbs and 16,000 lbs; (ii) Class 5 between 16,001 lbs and 19,500 lbs; (iii) Class 6 between 19,501 lbs and 26,000 lbs; (iv) and, Class 7 between 26,001 lbs and 33,000 lbs. FHA classifies Class 4, Class 5 and Class 6 trucks as Medium Duty and classifies Class 7 trucks as Heavy Duty. In terms of emission standards, the U.S. Environmental Protection Agency (EPA) classifies Class 4-5 trucks as Light Heavy Duty and Class 6-7 trucks as Medium Heavy Duty. The grants specified in this table equal the down payments projected to be required to purchase either a Class 4-5 or Class 6-7 electric truck for each specified truck model year, using the CARB Total Cost of Ownership Calculator available at: https://ww2.arb.ca.gov/sites/default/files/2019-05/190508tcocalc_2.xlsx. Consistent with industry practice, the down payment represents 10% of the amount due at the truck purchase, which includes the truck purchase price, the taxes and the registration (but not the fuel and maintenance).

0-8.45 Cont.

Attachment A, Exhibit 3
Local Delivery Truck Grant Program

Truck Model Year	Grant ($) per Truck (Class 2B-3)
2024	8,949
2025	8,762
2026	8,607
2027	8,467
2028	8,336
2029	8,213
2030 and later	8,090

Notes and Source: All assumptions are based on CARB data developed in the Advanced Clean Trucks rulemaking. The EPA classifies Class 2B trucks as trucks with GVWR between 8,500 lbs and 10,000 lbs and Class 3 trucks as trucks with GVWRs between 10,001 lbs and 14,000 lbs. The grants specified in this table equal the down payments projected to be required to purchase a Class 2B-3 electric truck for each specified truck model year, using the CARB Total Cost of Ownership Calculator available at: https://ww2.arb.ca.gov/sites/default/files/2019-05/190508tcocalc_2.xlsx. Consistent with industry practice, the down payment represents 10% of the amount due at the truck purchase, which includes the truck purchase price, the taxes and the registration (but not the fuel and maintenance).

0-8.45 Cont.

Attachment B

O-8.45
Cont.

Biological Resources

1) ***Lighting Program***. Reduce light and glare to maximum extent practicable. Implement a campus-wide lighting program in compliance with International Dark Sky Association standards with at least the following measures (except where doing so would violate safety requirements or federal, state, City or county governmental regulations; provided, however, that if doing so would violate such requirements or regulations, then WLC shall consult with Petitioner Parties and, should Petitioner Parties so decide, WLC and Petitioner Parties shall cooperate to attempt to persuade the decision maker to allow the lighting program described below).

   a) Light color of all exterior lighting, including street lights, shall be 2,700 Kelvin.

   b) Limit the heights of all freestanding and wall-mounted lights to 20 feet within 1,500 feet of the San Jacinto Wildlife Area ("SJWA").

   c) Dimmers to 25% output after sundown when no motion detected for ten minutes, subject to City approval, which approval WLC shall request.

   d) Motion sensors on all interior lighting shall be installed consistent with applicable Title 24 regulations.

   e) Require darker colored paint (Pantone 7501C) on all exterior building walls within 1,000 feet of the SJWA property line and visible from the SJWA to reduce glare.



   f) Plant trees within setback area to reduce glare to SJWA.

   g) Install full cut-off luminaries on buildings and poles.

   i) Installation of automatic blinds on office windows visible from the SJWA within 1,500 feet of the SJWA edge that automatically close within 20 minutes after sunset and open within 20 minutes of sunrise.

   h) Truck head lights shall be turned off within five minutes of truck parking.

0-8.45 Cont.

i) All construction lighting shall be shielded and directed away from the project's property lines.

2) SJWA Setback Area & Additional SJWA Protections

a) Truck yards shall be no closer than 350 feet from the southern boundary with SJWA, as depicted by the yellow line in the attached graphic. No buildings, truck courts, loading areas, parking, truck circulation areas, or truck or trailer storage, shall be permitted within the 350-foot setback area. Only landscaping, drainage facilities, and underground utilities shall be permitted. Emergency access and maintenance access shall also be permitted.

b) Warehouse buildings shall be no closer than 450 feet from the southern boundary with SJWA, as depicted by the red line in the attached graphic. *See* Attachment B, Exhibit 1 – Setback.

c) The SJWA setback area shall be subject to an open space deed restriction that limits uses within the 350-foot setback area to only landscaping, drainage facilities, underground utilities, emergency access, and maintenance access.

d) No lighting shall be located in the 350-foot setback.

e) No wall or fence shall be installed along the project's property line with the SJWA, unless required by California Department of Fish and Wildlife or other governmental authority.

0-8.45 Cont.

f) All portions of truck yards visible from the SJWA, including those truck yards adjacent to the SDG&E Moreno Compressor Station, shall be shielded by a wall or walls at least 14 feet high, if the City so permits under the Specific Plan, which permission WLC shall in good faith seek. In no event shall such walls be lower than 12 feet high.

g) WLC shall plant landscaping and design detention basins in the SJWA special edge treatment area so as to soften the southern appearance of truck yard screen walls by planting at least 50% of all trees at 24" box in size. Detention basins within the SJWA special edge treatment shall be designed and built no larger than necessary to handle the Specific Plan area's estimated storm water flow.

h) Landscaping within the SJWA special edge treatment area shall be substantially consistent with conceptual design set forth in the Specific Plan at pages 4-25 and 4-26.

i) Plant only low-biogenic and native vegetation in SJWA special edge treatment area.

j) At least 50% of trees within the 350-foot setback area shall be evergreen trees.

k) At least 50% of trees within the 350-foot setback area shall be native to Southern California.

l) No ornamental grasses shall be installed in the Specific Plan area. Only grasses, shrubs, or sub-shrubs listed in section 5.4.4 of the Specific Plan, which are all native grasses, shall be planted within the Specific Plan area.

m) Invasive, non-native grasses, shrubs, and sub-shrubs shall be removed from the Specific Plan area's developed portions as part of the WLC's regular landscaping services.

n) All leases shall inform tenants within 1,000 feet of the SJWA edge that the project is adjacent to the SJWA, which permits hunting.

o) Permanent signage in English and Spanish shall be installed within 450 feet of the SJWA stating that such area is within 450 feet of an area that permits hunting.

3) ***SJWA Conservation Fund***—Upon the issuance of a building permit for a warehouse building south of Alessandro Blvd., WLC shall fund a $4 million account for (i) land acquisition efforts to augment the SJWA, (ii) SJWA conservation efforts, (iii) wildlife corridor crossings on Gilman Springs Road, (iv) facilitating native plantings, (v) plant management, (vi) other conservation efforts, or (vii) administration of such funds. The funds shall be managed by a third-party, non-profit entity or foundation chosen by Petitioner Parties.

4) ***SDG&E Moreno Compressor Station Shielding.***

a) ***Landscaping.*** Prior to the issuance of a certificate of occupancy for a warehouse building south of Alessandro Blvd. and north of the SDG&E Moreno Compressor Station, landscaping that substantially blocks vehicle lights shall be installed and maintained around the project's western, northern, and eastern property line abutting the SDG&E Moreno Compressor Station.

b) ***Fencing.*** Prior to the issuance of a certificate of occupancy for a warehouse building south of Alessandro Blvd., ten foot tall fencing with metal mesh installed below and above ground level to prevent animals from moving between the SDG&E Compressor Station and SJWA shall be installed and maintained around the western, northern, and eastern property line abutting the SDG&E Moreno Compressor Station.

5) ***Davis Road***—WLC shall support efforts to keep Davis Road closed north of the SJWA, as shown on the attached map, including the placement of a gate near Alessandro Blvd. No access from the north via Davis Road for the property located at 16200 Davis Road shall be requested. *See* Attachment B, Exhibit 2 – Horse Ranch Exhibit.

6) ***WLC Open Space Area (Planning Area 30).***

a) WLC shall not build any buildings within Planning Area 30. WLC shall provide notice of any property transfer or proposed activity within Planning Area 30 within 30 days of such transfer or formal proposed activity.

b) Prior to the issuance of a certificate of occupancy for any warehouse building adjacent to Planning Area 30, a wall at least 14 feet high, if the City so permits, which approval

O-8.45 Cont.

WLC shall in good faith request, shall be constructed along the warehouse building's southern edge. In no event shall such wall be lower than 12 feet high.

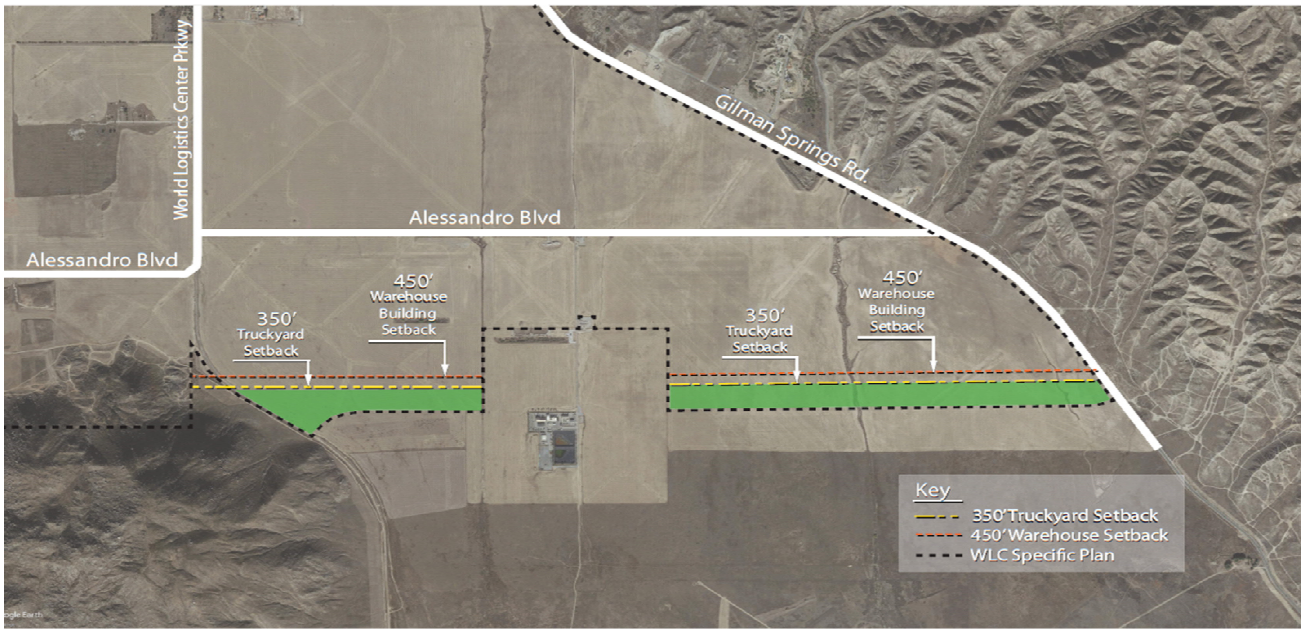
7) SJWA Boundary & Setbacks.

a) For purposes of this Agreement, SJWA boundary shall mean SJWA's boundaries as they exist as of the Effective Date of the Agreement.

b) All setback obligations from the SJWA shall be as shown on the following attachment. *See* Attachment B, Exhibit 1 – Setback.

O-8.45
Cont.

Attachment B, Exhibit 1 – Setback



March 2021
N.T.S.

Setback to SJWA

0-8.45 Cont.

Attachment B, Exhibit 2 – Horse Ranch Exhibit



O-8.45
Cont.

Attachment C

O-8.45
Cont.

Community Benefits

1) ***Berms/Screening Before Warehouse Construction***

   a) The berms to be installed along Redlands Blvd. and Merwin St. shall be completed before the construction of any warehouses within 1,000 feet of Redlands Blvd. or Merwin St.

   b) Either the berm to be installed along Bay St. or a temporary barrier sufficient to substantially screen warehouse construction activities shall be completed before the construction of any warehouses within 1,000 feet of Bay St.

2) ***Setbacks From residentially zoned property***. Buildings shall be setback at least 290 feet measured from the nearest existing City residential zoning boundary (which is currently the centerline of Redlands Blvd., Bay Ave., and Merwin St.). Notwithstanding the foregoing, buildings of no more than 45 feet in height, as measured pursuant to the Specific Plan, shall be setback at least 250 feet from the nearest existing City residential zoning boundary.

3) ***Visual Protections/Berms/Landscaping***

   a) **Landscaping/Screening**

      i) Merwin St. Berm: WLC will install a berm and landscaped area on the east side of Merwin St. similar to that to be installed on Redlands Blvd. to screen future buildings and development as viewed from Merwin St.

      ii) Enhancements to Berm: The property's Western Edge, as defined by the Specific Plan and as shown in Specific Plan Exhibit 4-1, when viewed from the western side of Redlands Boulevard and Merwin Street and the southern side of Bay Avenue, shall be developed to screen future buildings with walls, berms, and/or landscaping as follows.

         (1) For a minimum of 25% of the linear length of the berms, the entirety of the buildings and roof mounted equipment behind the berms shall be substantially screened by walls, berms, and/or landscaping at maturity at all times of the year. "Substantially screened" means that while there might be some view of the buildings looking through the foliage, the buildings will be mostly obscured from view.

         (2) For a minimum of 25% of the linear length of the berms, all but the top five feet of the buildings and roof mounted equipment behind the berms shall be substantially screened by walls, berms, and/or landscaping at maturity at all times of the year.

         (3) For the remaining 50% or less of the linear length of the berms, all but the top fifteen feet of the buildings and roof mounted equipment behind the berms shall be substantially screened by walls, berms, and/or landscaping at maturity at all times of the year.

O-8.45 Cont.

(4) In the event the above levels of screening on the Western Edge are not achieved within 15 years of landscaping's installation, WLC shall do supplemental planting to meet the above levels of screening.

iii) Larger Trees than the Specific Plan Requires: WLC will plant larger trees within the Specific Plan's Western Edge, as follows: 50% of all trees to be 24" box.

iv) Evergreen Trees:

(1) Western Edge. Evergreen trees shall constitute 85% of all 24" box trees planted within the Specific Plan's Western Edge.

(2) Specific Plan Campus. Evergreen trees shall constitute 50% of all trees planted within the WLC. For purposes of defining evergreen trees, deciduous trees that behave like evergreen trees in the Southern California climate shall be considered evergreen trees.

v) Varied Appearance: Landscaping on the Western Edge shall avoid a linear appearance through implementation of the following measures:

(1) Trees shall be planted at varied depths from the World Logistic Center's property line so that they do not create a uniform and linear appearance and create a layering effect as viewed from adjacent streets so as to maximize screening of World Logistic Center buildings;

(2) Consistent with layering effect, larger evergreen trees shall be concentrated towards the top of the berms to maximize screening;

(3) To the extent practicable, berm contours shall vary and accent elements, such as boulders, shall be placed on berm slopes facing adjacent streets to create visual interest; and

(4) Trees within the Western Edge shall be maintained in their natural form and shape with minimal pruning.

vi) Dead trees shall be promptly removed and replaced with similar type trees.

vii) Use of palm trees shall be limited to accent areas only.

viii) Plant trees in the parking areas that are capable of achieving 50% shading within ten years.

ix) Use concrete for parking lots with concrete having a solar reflective index of no less than 30.

O-8.45 Cont.

4) ***Architectural Design***

a) Screen all rooftop equipment: (i) visible from any existing residential homes within 1,000 feet of the property's Western Edge; or (ii) within 1,000 feet of the San Jacinto Wildlife Area ("SJWA"). Rooftop equipment shall be screened using the building's parapet wall or other architectural element that appears to be or is an integral part of the building.

b) No portion of any building that is closer than 600 feet to the centerline of Redlands Blvd., Bay Ave., or Merwin St. shall exceed 60 feet in height (portions that are farther away may exceed 60 feet in height).

c) For warehouse buildings abutting the Western Edge that are not substantially screened, the rooflines shall be designed to avoid long linear flat walls through the incorporation of architectural features like breaks, wall offsets, height variations, and/or accent features.

5) ***Homeowner or Resident Reimbursements***

a) Air Filtration System Reimbursement Program.

i) WLC shall pay 90% of the costs of purchasing and installing non-portable air filtration systems ("Air Filtration System Reimbursement Program"), including any necessitated HVAC modification, which cost shall not exceed $25,000 per home, as follows.

(1) The home is an eligible home as shown on the attached map. *See* Attachment C, Exhibit 1 – Filter Overview Map.

(2) The homeowner or resident requests payment within five years of the commencement of grading or commencement of construction of a warehouse building within 2,000 feet of such homes.

(3) In the event a property owner or resident has a household income less than 80% of the Area Median Income as determined by the Department of Housing and Urban Development, WLC shall pay 100% of the cost of the air filtration system up to $25,000.

ii) The project shall mail notice via registered or certified mail of the Air Filtration System Reimbursement Program to Petitioners and to residents and property owners of record of the qualified homes prior to the issuance of the project's first grading or building permit within 2,000 feet of the homes and annually thereafter for four years. The notice shall identify the exact date when the five year period starts and ends. Proof of mailing shall be provided to Petitioners. The project's website shall also include notice of the Air Filtration System Reimbursement Program during the program's five-year term, including identifying which homes have started the five year window and when it ends.

O-8.45 Cont.

iii) The homeowner or resident may select and contract with a contractor or installer of the homeowner's or resident's choice.

b) Noise Insulation Reimbursement Program.

i) WLC shall pay 90% of the costs of purchasing and installing noise insulation measures ("Noise Insulation Reimbursement Program"), which cost shall not exceed $10,000 per home, as follows.

(1) The home is an eligible home as shown on the attached map. *See* Attachment C, Exhibit 2 – Sound Proofing Overview Map.

(2) The homeowner or resident requests payment under the Noise Insulation Reimbursement Program within five years of the commencement of grading or commencement of construction of a warehouse building within 2,000 feet of such homes.

ii) The project shall mail via registered or certified mail notice of the Noise Insulation Reimbursement Program to Petitioners and to residents and property owners of record of the qualified homes at least 60 days before the issuance of the project's first grading or building permit within 2,000 feet of the homes and annually thereafter for four years. The project's website shall also include notice of the Noise Insulation Reimbursement Program during the program's five-year term, including identifying which homes have started the five year window and when it ends.

iii) The homeowner or resident may select and contract with a contractor or installer of the homeowner's or resident's choice.

iv) In the event a property owner or resident has a household income less than 80% of the Area Median Income as determined by the Department of Housing and Urban Development, WLC shall pay 100% of the cost of the noise insulation measures up to $10,000.

c) Exterior Pressure Washing Reimbursement.

i) Due to possible dust during grading, WLC shall reimburse each homeowner for exterior pressure washings of the first two rows of homes on the west side of Redlands Blvd., south side of Bay Ave., and west side of Merwin St. up to $500 per house.

d) Additional Homeowner Outreach. Petitioners are free to engage in their own homeowner notification, outreach and efforts to maximize awareness and success of the air filtration, noise insulation, and power washing programs, either directly or through a contractor or third party nonprofit. WLC shall provide funds of up to $120,000 to a designated nonprofit or foundation selected by Petitioners upon the issuance of the Project's first grading or building permit for work within 2,000 feet of any home identified in sections 5(a)(i)(1) and 5(b)(i)(1). WLC will annually notify Petitioners of how many and which homes have used this program. Petitioners may also request this information, and the

O-8.45 Cont.

WLC shall provide it within 30 days. WLC shall also notify Petitioners of any rejected requests under the air filtration, noise mitigation, and/or pressure washing program for any home with a rationale for the rejection within 30 days of such rejection. Any unused funds from this $120,000 may be directed to other philanthropic activities to benefit the City of Moreno Valley if any funds remain after the expiration of the reimbursement programs.

6) ***Noise***

a) **Project Operations**

i) All portions of truck yards that are visible from Redlands Blvd., Merwin St., Bay Avenue and the SJWA shall be shielded by walls at least 14 feet high, if the City so permits. WLC shall apply for an administrative variance pursuant to Specific Plan section 11.3.3.1, if necessary, and make a good-faith effort to seek permission to install these 14-foot high walls. In no event shall such walls be lower than 12 feet high.

ii) All portions of truck circulation drive aisles that are visible from any existing home within 1,000 feet of the Specific Plan's Western Edge shall be shielded by walls at least 14 feet high, if the City so permits. WLC shall apply for an administrative variance pursuant to Specific Plan section 11.3.3.1, if necessary, and make a good-faith effort to seek permission to install such 14-foot high walls. In no event shall such walls be lower than 12 feet high.

iii) No exterior mechanical building equipment generating noise levels above 50 dBA CNEL measured at the property line of each of the homes located West of Redlands Blvd., south of Bay Ave., and west of Merwin St. shall be installed, absent the written consent of such affected homeowner.

iv) Buildings located between E Street and Redlands Blvd. or 500 feet east of Merwin St. shall not have loading docks or parking areas facing residential home frontage on Redlands Blvd. or Merwin St., as shown on attached map in red. *See* Attachment C, Exhibit 3 – Map for No Docks Facing Existing Homes.

v) Prohibit outdoor loading activities within 1,000 feet of any existing home between 9:00 p.m. to 6:00 a.m. if noise levels exceed 50 dBA CNEL measured at the property line of each such home located West of Redlands Blvd., south of Bay Ave., and west of Merwin St., absent the written consent of such affected homeowner or resident.

vi) No outdoor speakers that exceed 45 dBA Leq measured at the property line of any existing home between 7:00 p.m. and 7:00 a.m. within 1,500 feet of any residential property fronting Redlands Blvd., Merwin St., and Bay Ave. except in the event of an emergency, absent the written consent of such affected homeowner.

0-8.45 Cont.

b) **Project Construction**

i) No nighttime grading or outside construction between 6:00 p.m. and 7:00 a.m. shall be conducted within 1,000 feet of any existing home west of Redlands Blvd., south of Bay Ave., and west of Merwin St., except if necessary for concrete pours.

ii) Notice shall be provided to residents within 750 feet of the Western Edge at least one week prior to construction between 6:00 p.m. and 7:00 a.m.

7) ***Lighting***

a) The heights of all outdoor freestanding and wall-mounted lights shall not exceed 20 feet within 1,000 feet of the centerline of Redlands Blvd., Bay Ave., and Merwin St., except where doing so would violate safety requirements or federal, state, City or county governmental regulations.

b) All outdoor freestanding and wall-mounted lights within 1,000 feet of the centerline of Redlands Blvd., Bay Ave., and Merwin St. shall dim to 50% output after sundown when no motion detected for ten minutes.

8) ***Operational Trucking/Employee Trips***

a) **Provide On-Site Truck Parking (to discourage parking in neighborhoods)**

i) Dedicate 7-10 acres east of Theodore St. and north of Alessandro Blvd. for fueling and trucker personal services, such as food service, showers, resting, truck washes, repair facility, etc. ("Truck Service Area").

ii) Auxiliary power unit ("APU") plug-ins shall be provided at each designated Class 8 truck parking spot in the Truck Service Area.

iii) Provide conduit and prewiring in the Truck Service Area to accommodate potential heavy duty truck charging facilities.

iv) Ongoing private security shall be provided within the Truck Service Area.

v) WLC shall in good faith advocate for the City to permit overnight parking within the WLC for trucks servicing WLC tenants.

vi) Provide sufficient on-site truck parking within parking lots and/or public rights-of-way to enable all trucks reasonably expected to visit WLC to park on-site (as determined by a qualified transportation engineer).

vii) Install permanent signs in English and Spanish to inform truck drivers of the on-site amenities, including the Truck Service Area.

viii) Maps of designated City truck routes shall be made available within truck amenity facilities and the Truck Service Area.

O-8.45 Cont.

ix) All limitations regarding trucking activities shall be provided to tenants upon lease commencement and leases shall require tenants to inform employees and third-party truckers of these limitations through a WLC-maintained website containing these limitations.

b) **Off-Street Community Truck Parking Planning & Advocacy Fund**

i) WLC shall, upon the commencement of construction of the first warehouse building, pay $150,000 to a mutually agreeable non-profit entity or foundation to fund efforts (1) to advocate for and support the development of off-street parking for Class 8 trucks in or adjacent to Moreno Valley and not within the WLC, and (2) to advocate for the City's adoption of a $1,000 street parking fine for illegal truck parking on residential streets and in residential neighborhoods.

(1) In the event the City does not adopt a $1,000 fine for illegal truck parking on residential streets then, when 5 million square feet of warehouse buildings between WLC Parkway and Redlands Blvd. have received their certificates of occupancy, WLC shall provide nighttime private patrol (10:00 p.m. to 6:00 a.m.) for 7 years to patrol residential streets within one-half mile of the project to report any overnight/illegal truck parking to authorities. If 18 or fewer WLC related infractions are identified after any three-year period, the patrol may be discontinued.

c) **Prohibiting Trucks on Cactus Avenue**

O-8.45 Cont.

i) Trucks shall not be permitted to use Cactus Ave. as a truck route between WLC and Perris Blvd. If the City approves the installation of physical measures to prevent trucks from using Cactus Avenue (e.g., signage, speed humps, etc.), WLC shall fund up to $200,000 to implement such measures.

(1) Unused funds, which are funds not expended within five years of certificates of occupancy having been issued for 5 million square feet of warehouse uses approved under the Specific Plan, shall be provided to a mutually agreeable non-profit entity dedicated to supporting the SJWA and/or the community of Moreno Valley.

ii) Prohibit WLC trucks from using Cactus Ave. in tenant leases.

d) **Prohibiting Trucks on Redlands Blvd. South of Eucalyptus**

i) Prohibit WLC truck use of Redlands Blvd. south of the roundabout at Eucalyptus Ave. in tenant leases.

ii) If the City approves permanent signage prohibiting trucks from using Redlands Blvd., then WLC shall fund up to $50,000 to install such signage.

(1) Unused funds, which are funds not expended within five years of certificates of occupancy having been issued for 5 million square feet of warehouse uses

approved under the Specific Plan, shall be provided to a mutually agreeable non-profit entity dedicated to supporting the SJWA and/or the community of Moreno Valley.

e) **Alessandro Blvd. Closure**

i) Upon the completion of the extension of Cactus Ave., Alessandro Blvd. east of Merwin St. shall be closed to vehicular traffic (other than emergency vehicles).

f) **Truck Turning Prohibitions (to avoid turning in prohibited directions)**

i) To discourage trucks from turning the wrong direction when entering or leaving the WLC, design and install physical measures the City and Fire Department approves (e.g., curbs that force turns in only one direction, bumps/textures that rattle vehicles traversing them, etc.).

ii) Install signage clearly stating which directions trucks must turn at all streets exiting the Specific Plan area.

g) **No Truck Parking Signage**

i) If the City approves a "no truck parking" signage program within one mile of the WLC, fund implementation of that program up to $200,000.

(1) Unused funds, which are funds not expended within five years of certificates of occupancy having been issued for 5 million square feet of warehouse uses approved under the Specific Plan, shall be provided to a mutually agreeable non-profit entity dedicated to supporting the SJWA and/or the community of Moreno Valley.

O-8.45 Cont.

h) **Prohibit Off-Site Employee Parking**

i) Provide free on-site employee parking.

ii) To discourage employee parking within neighborhoods, prohibit employee "walk-ins" onto WLC campus at the start and end of shifts, unless the employee lives within walking distance of WLC.

iii) Prohibit off-site employee parking in tenant leases.

i) **Worker Education / Enforcement of Trucking and Parking Requirements**

i) Upon the issuance of the certificate of occupancy for the first warehouse building, WLC shall implement an ongoing program to educate truckers, tenants, and construction workers of all of the rules and requirements expected of them, including the applicable GHG/air quality measures listed in Sections 2 and 3 of Attachment A to the Agreement and the other requirements listed in this Attachment C to the Agreement. The education program shall be in English and Spanish and shall include

prominently posted signage throughout the project site, including a requirement in tenant leases obligating tenants to inform employees, temporary workers, contractors, and third-party truckers of the rules by posting the rules in lounges provided at their warehouses. WLC shall also maintain a website with a trucker and construction worker information page specifying the rules. The educational information with the rules developed under this program shall be provided to all tenants in paper form (e.g., a pamphlet) on request and at least annually for inclusion in lounges.

ii) WLC shall install permanent reflective signage in English and Spanish no less than every 25 feet along the interior of truck yard screening walls facing loading docks stating limits on engine idling, vehicle lights, and APUs.

j) **Employee Trip Reduction Measures**

i) WLC shall implement the following measures to reduce Specific Plan employee trips.

(1) Provide on-site meal areas.

(2) Provide up to 1,000 eBike subsidies in the amount of $500 to WLC employees who commit to bike to work at least twice per week on average. The subsidies will be phased proportionately with buildout of the first 15 million square feet of the project.

(3) Provide on-line transit incentive "virtual kiosk" giving free transit assistance to WLC employees (e.g., ridesharing/carpooling connections, assistance determining best bus routes, sales of bus passes, etc.).

(4) Develop and implement program to ensure knowledge of trip reduction measures by project employees.

(5) Provide 40% subsidies for bus passes for tenants' employees who commit to bus to work at least twice per week on average.

(6) Require tenants to have trip reduction plans to achieve 1.3 average vehicle ridership as a factor of total number of employees (in tenant leases).

(7) Require tenants to have a Transportation Management Association to encourage carpooling (in tenant leases).

(8) Provide bike lockers for 5% or more of building users within 50 yards of employee building entrances.

(9) Provide short-term bike racks near employee building entrances.

(10) Provide preferential parking for carpools and vanpools equal to 5% of total parking spaces.

(11) Provide designated parking spaces for motorcycles.

O-8.45 Cont.

(12) Fund a zero emission shuttle that circulates within the Specific Plan area and has pickup and drop-offs at the closest off-site bus stop no later than the issuance of a certificate of occupancy for 15 million square feet of warehouse buildings.

9) ***Multi-Use Trail***

a) Pursuant to Specific Plan section 3.4.2, WLC shall construct a multiuse trail along the Western Edge that connects to the existing trail segment on the west side of Redlands Blvd. via a crosswalk at Cottonwood Avenue and Redlands Boulevard, the trail segment on Eucalyptus Ave., and the existing trail on Cactus Ave. *See* Attachment C, Exhibit 4 – WLC Specific Plan Trail Map.

b) Completion of the multiuse trail along the northern portion of Eucalyptus Avenue between Theodore Street and Redlands Boulevard shall be completed no later than the completion of the southern half of Eucalyptus Avenue between Theodore Street and Redlands Boulevard.

c) Pursuant to Specific Plan section 3.4.3, Class II bikeways shall be provided along all roadways within the project.

10) ***Graffiti & Trash Abatement***

a) Graffiti shall be removed within one week of identification or notification.

b) Trash removal within and along all WLC edge areas shall occur at least every other week or within three business day of receipt of notification by community ombudsman.

O-8.45 Cont.

11) ***Construction Vehicles/Trucking***

a) Prohibit construction trucks from using Redlands Blvd., other than for infrastructure construction or necessary detours

b) Provide lunch vendor services on-site for construction workers.

12) ***Community Outreach and Transparency***

a) WLC shall implement the following community measures.

i) Provide a designated ombudsman and 24-hour hotline to address neighbor concerns prior to the commencement of construction and such hotline shall be maintained for 10 years beyond the Specific Plan's full buildout. A live operator shall staff the hotline 24 hours per day. The hotline number shall be mailed to all properties within 1,500 feet of project site no more than one month prior to the commencement of grading on the property.

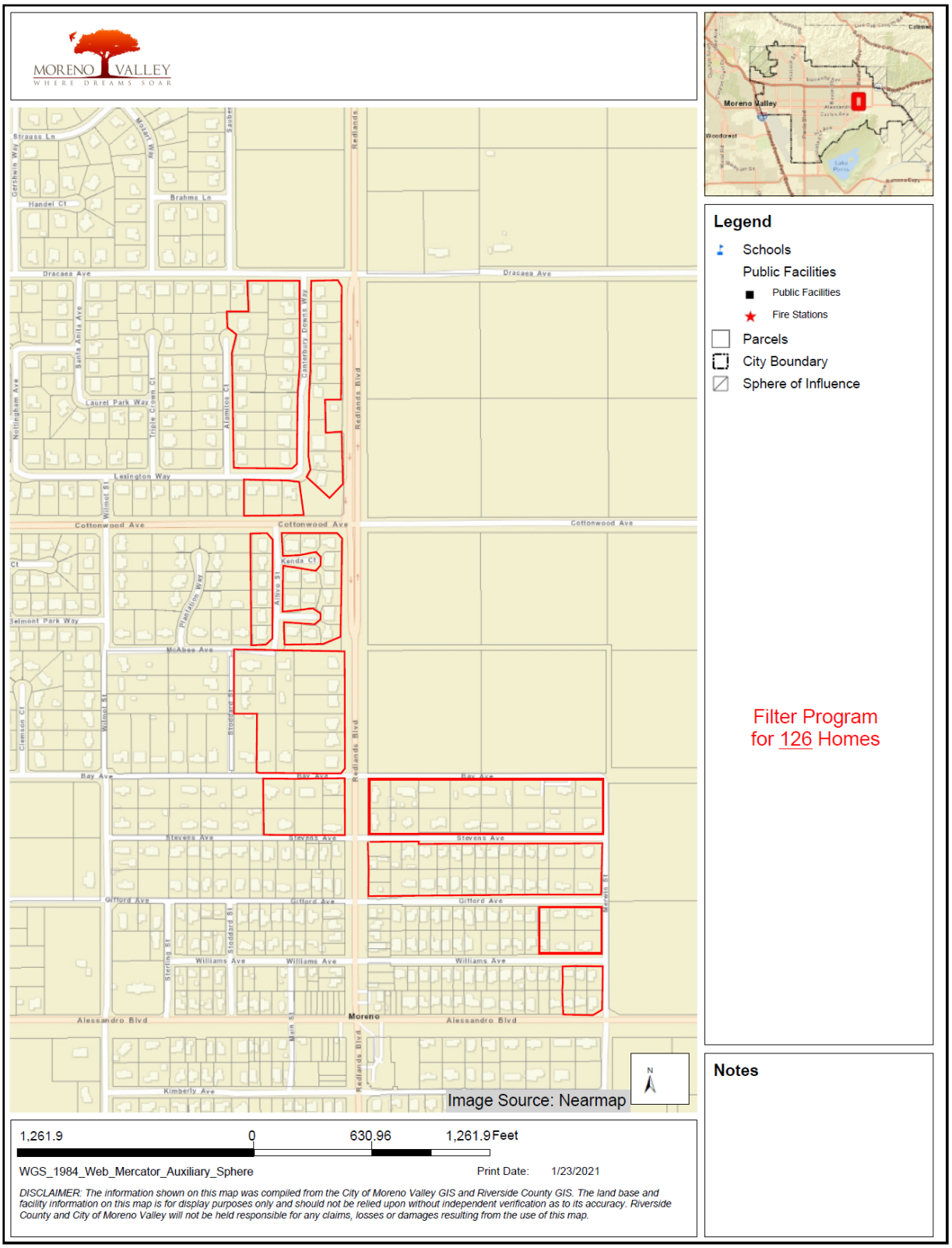
ii) Permanent signs at the project's five main entrances, easily read from the street, shall be installed and shall provide the ombudsman hotline number and state that the

ombudsman may be contacted regarding graffiti, trash, illegal truck parking, or other operational disturbances.

iii) Give notice of any discretionary permit applications for development to any groups or individuals who so request and to residents and property owners within 1,000 feet of the parcel for which work is proposed. Petitioners shall be notified when any project development application is formally submitted to the City and a copy of the proposal and plans shall be provided digitally.

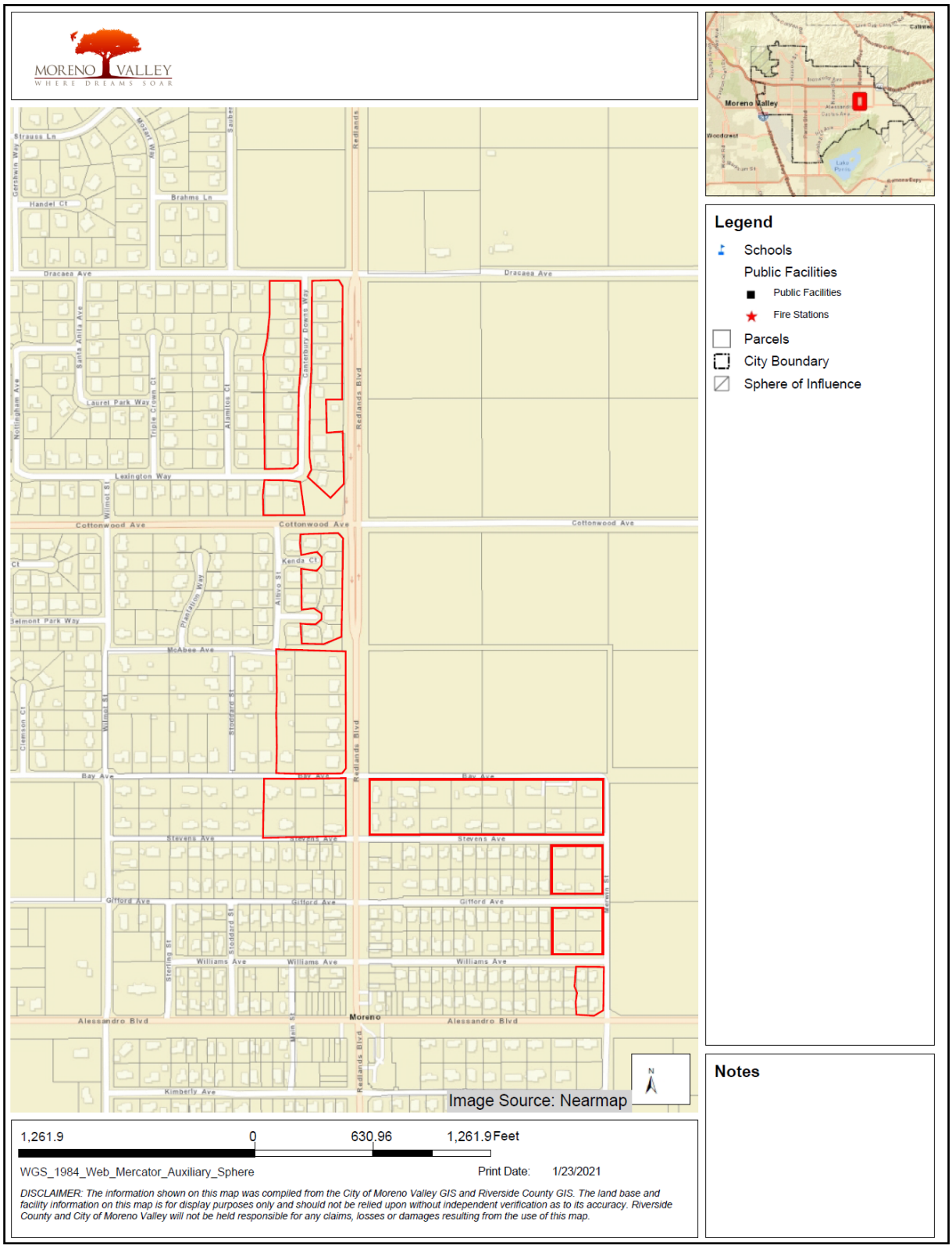
O-8.45
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Attachment C, Exhibit 1 – Filter Overview Map



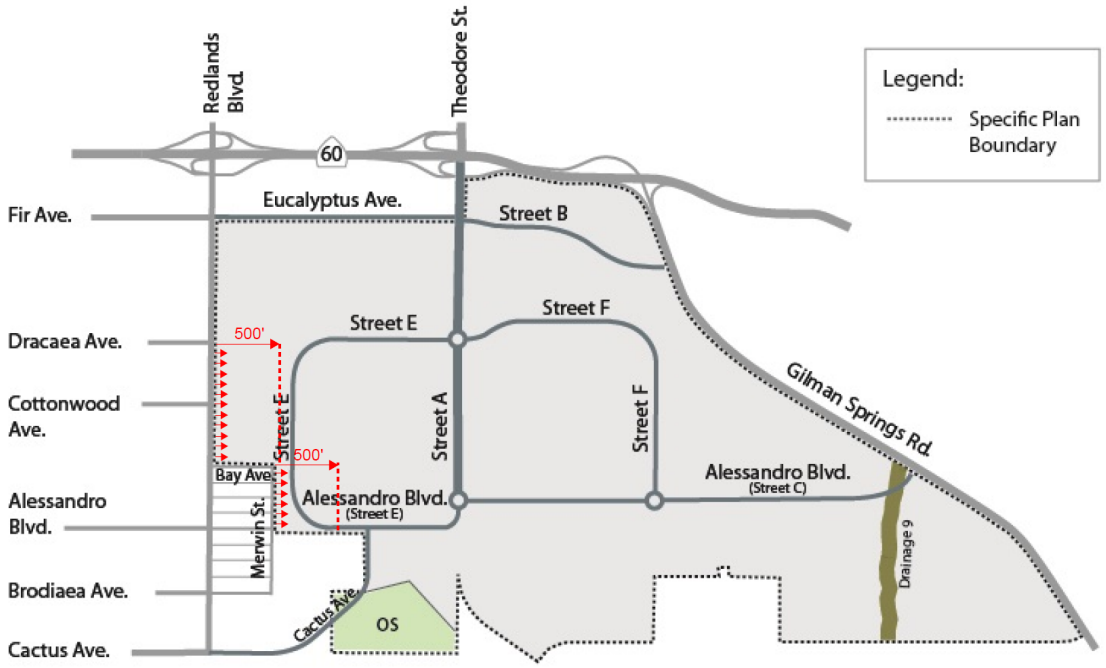
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Attachment C, Exhibit 2 – Sound Proofing Overview Map



0-8.45 Cont.

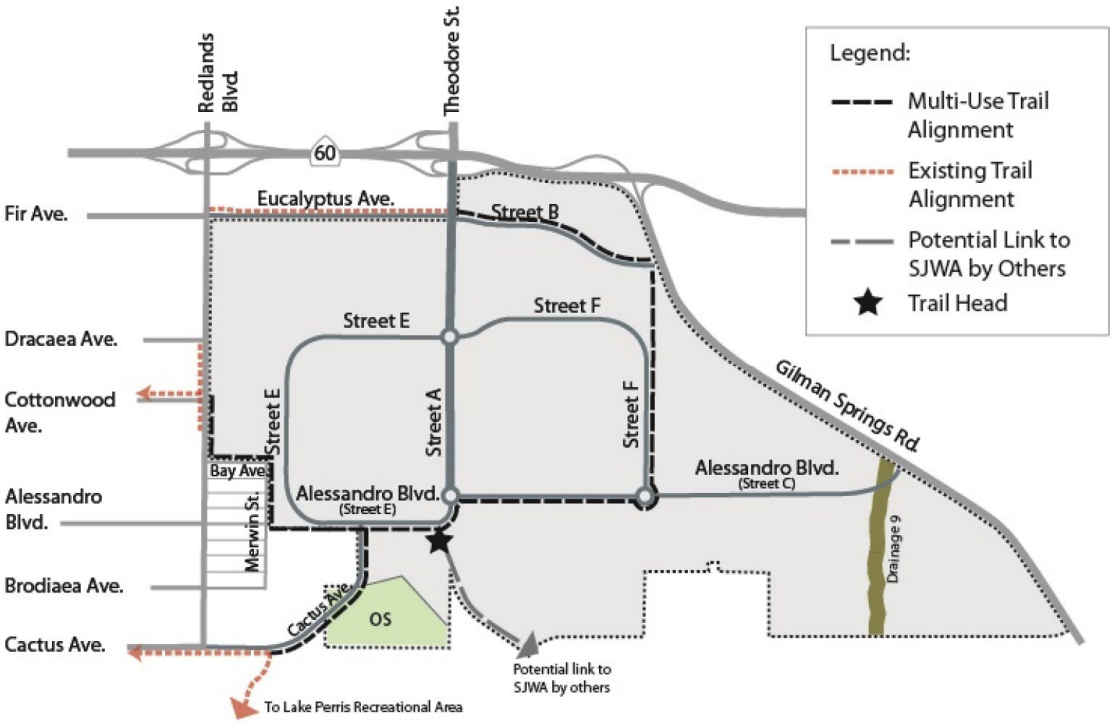
Attachment C, Exhibit 3 – Map for No Docks Facing Existing Homes



Location of No Dock Doors Facing Existing Homes

O-8.45 Cont.

Attachment C, Exhibit 4 – WLC Specific Plan Trail Map



0-8.45 Cont.

APPENDIX E



CONDITIONS OF APPROVAL FOR CENTERPOINT PROPERTIES (Applicant/Owner): COUNTY FILE #'s CDDP18-03007 and CDMS19-00009,

Project Approval:

1. Development is APPROVED as generally described in the application materials received by the Department of Conservation and Development/Community Development Division (CDD) on August 28, 2018, (including Tentative Map submitted October 29, 2019), and subject to the conditions below.

Compliance Review:

2. At least 30 days prior to issuance of a building permit, the applicant shall provide a permit compliance report to CDD for review and approval. The report shall identify all conditions of approval that are administered by CDD. The report shall document the measures taken by the applicant to satisfy all relevant conditions. Copies of the permit conditions may be obtained from CDD. Unless otherwise indicated, the applicant will be required to demonstrate compliance with the conditions of this permit prior to requesting County issued permits.

   The permit compliance review is subject to staff time and materials charges, with an initial deposit of $1,000 which shall be paid at the time of submittal of the compliance report.

3. At least 30-days prior to occupancy, any proposed tenant shall submit a Property Use Verification (PUV) application to CDD staff in order to verify consistency with this permit. The PUV will be necessary to obtain any required business licenses from the County Tax Collector's Office.

General Provisions:

4. Any deviation from or expansion beyond the limits of this permit approved under this application may require the filing of a request for modification of the Development Plan Permit.

5. A publicly visible sign shall be posted on the property with the telephone number and person to contact regarding construction-related complaints. This person shall respond and take corrective action within 24 hours. The CDD phone number to call in complaints shall also be visible to ensure compliance with applicable regulations.

O-8.46 Cont.

6. Applicant shall make best efforts to hire employees, workers, and subcontractor components for jobs from the Richmond/North Richmond community.

7. At least 30 days prior to submittal of a building permit for signage, a detailed sign program shall be submitted for the review and approval of CDD.

8. The applicant shall pay the Contra Costa County, Department of Conservation and Development, Current Planning Division, a flat not-to-exceed amount of $125,000 as its fair share contribution towards the cost of a General Plan/Zoning Ordinance update for the North Richmond area.

Aesthetics:

9. At least 30 days prior to applying for a building permit, the applicant shall submit for review and approval by the Contra Costa County Department of Conservation and Development staff a Final Lighting Plan. Light standards shall be low-lying and exterior lights on the buildings shall be deflected so that lights shine onto the applicant's property. **(Mitigation Measure (MM) AES – 1)**

Air Quality:

0-8.46 Cont.

10. The project applicant shall ensure, at minimum, the use of equipment that meets the United States Environmental Protection Agency's (EPA) Tier 4 Interim emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower for all site preparation, grading, and building construction activities, unless it can be demonstrated, to the Contra Costa County Department of Conservation and Development's satisfaction, that such equipment is not available. Any emission control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Tier 4 Interim emissions standards for a similarly sized engine, as defined by the California Air Resources Board (ARB) regulations.

    Prior to the issuance of building or grading permits, the project applicant shall ensure that all construction (e.g., demolition and grading) plans clearly show the requirement for EPA Tier 4 Interim emissions standards for construction equipment over 50 horsepower for the specific activities stated above.

    During construction, the project applicant shall ensure that a list of all operating equipment in use on the construction site is maintained on-site for verification by the Contra Costa County Department of Conservation and Development. The construction equipment list shall state the makes, models, Equipment Identification Numbers, and number of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the

manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. **(MM AIR-2a)**

11. The project's construction contractor shall comply with the following Bay Area Air Quality Management District (BAAQMD) Best Management Practices (BMPs) for reducing construction emissions of PM_{10} and $PM_{2.5}$:

    - Water all active construction areas at least twice daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour (mph). Reclaimed water should be used whenever possible.
    - To control dust, pave, apply water twice daily or as often as necessary, or apply (nontoxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
    - Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
    - Sweep daily with water sweepers (using reclaimed water if possible) or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.
    - Sweep public streets daily (with water sweepers using reclaimed water if possible) or as often as needed in the vicinity of the project site to keep streets free of visible soil material.
    - Hydroseed or apply nontoxic soil stabilizers to inactive construction areas.
    - Enclose, cover, water twice daily, or apply nontoxic soil binders to exposed stockpiles (e.g., dirt, sand, etc.).
    - Limit vehicle traffic speeds on unpaved roads to 15 mph.
    - Replant vegetation in disturbed areas as quickly as possible.
    - Install sandbags or other erosion control measures to prevent silt runoff from public roadways. **(MM AIR-2b)**

0-8.46 Cont.

12. Prior to issuance of the certificate of occupancy, Contra Costa County shall require future tenants proposing operations that have potential to emit nuisance odors to prepare an odor management plan that identifies project design features, measures, and control technologies to ensure compliance with Bay Area Air Quality Management District (BAAQMD) Regulation 7, Odorous Substances, which requires abatement of any nuisance generating an odor complaint. Facilities that have the potential to generate nuisance odors include, but are not limited to:

    - Composting, green waste, or recycling facilities
    - Fiberglass manufacturing facilities
    - Painting/coating operations
    - Large-capacity coffee roasters
    - Laboratory operations
    - Food-processing facilities

    The odor management plan for the proposed facility shall be submitted to the County prior to the issuance of the certificate of occupancy. During operation of the proposed facility, the County shall conduct periodic evaluation of on-site odors per the schedule and reporting requirements outlined in the odor management plan. **(MM AIR-4)**

O-8.46 Cont.

<u>Zero Emission Vehicle Requirements</u>:

13. The following mitigation measures shall be implemented during all on-going business operations and shall be included as part of contractual lease agreement language to ensure the tenants/lessees are informed of all on-going operational responsibilities.

    a. The property owner/tenant/lessee shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025 or when commercially available for the intended application, whichever date is later.

        "Domiciled at the project site shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere).

Zero-emission heavy-duty trucks which require service can be temporarily replaced with model year 2014 or later trucks. Replacement trucks shall be used for only the minimum time required for servicing fleet trucks.

b. The property owner/tenant/lessee shall utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2023, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2025, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2027.

   "Domiciled at the project site" shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere).

   Zero-emission vehicles which require service can be temporarily replaced with alternate vehicles. Replacement vehicles shall be used for only the minimum time required for servicing fleet vehicles.

   The property owner/tenant/lessee shall not be responsible to meet "clean fleet" requirements for vehicles used by common carriers operating under their own authority that provide delivery services to or from the project site.

c. The applicant, property owner, tenant, lessee, or other party operating the facility (the "Operator") shall procure the zero emission vehicles/trucks required to meet the "clean fleet" requirements in (a) and (b) above. Within 30-days of occupancy, the Operator shall demonstrate to the satisfaction of CDD staff, that the applicable clean fleet requirements are being met.

   In the event that there is a disruption in the manufacturing of zero emission vehicles/trucks or that sufficient vehicles/trucks are not commercially available for the intended application, the "clean fleet requirements" may be adjusted as minimally as possible by the CDD to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks. The Operator shall quantify the GHG, criteria and toxic contaminant emissions resulting from any delayed compliance of this condition and submit the findings to CDD for review and approval. The Operator shall propose mitigation measures to reduce additional emissions resulting from any delay in compliance to a less than significant level, as

O-8.46
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provided for in MM-GHG 1g. The Operator shall prioritize procuring any necessary GHG emissions offsets from the North Richmond area and surrounding community, thereby further reducing criteria air pollution and toxic air contaminants in the immediate area. The Operator shall implement the proposed measures after CDD review and approval. Any extension of time granted to implement this condition shall be limited to the shortest period of time necessary to allow for 100% electrification under the clean fleet requirements. The CDD staff may seek the recommendation of the California Air Resources Board in determining whether there has been a manufacturing disruption or insufficient vehicles/trucks commercially available for the intended application.

The Operator shall submit a condition of approval compliance report within 30 days of, but not later than, the following dates: December 31, 2023, December 31, 2025, and December 31, 2027. The report shall outline clean fleet requirements applicable at each report interval and include documentation demonstrating compliance with each requirement. The County Zoning Administrator shall consider each report at a noticed public hearing and determine whether the Operator has complied with the applicable clean fleet requirements. If the Operator has not met each 100% clean fleet requirement by December 31, 2027, then the Operator shall submit subsequent reports every year until the 100% clean fleet requirement is implemented. The County Zoning Administrator shall consider each subsequent report at a noticed public hearing and determine whether the Operator has complied with the clean fleet requirements, including any minimal adjustments to the requirements by the CDD to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks, as described in the previous paragraph.

After the 100% clean fleet requirement has been implemented and confirmed by the CDD, the Operator shall submit to the CDD an on-going compliance report every three years containing all necessary documentation to verify that the Operator is meeting the clean fleet requirements. At the time it confirms that the 100% clean fleet requirement has been implemented, the CDD will establish the due date for the first on-going compliance report. Each subsequent on-going compliance report shall be due within 30 days of, but not later than, the three-year anniversary of the preceding due date. The on-going compliance reports and accompanying documentation shall be made available to the public upon request.

O-8.46 Cont.

d. The property owner/tenant/lessee shall ensure all on-site equipment and vehicles (e.g., yard hostlers, yard equipment, forklifts, yard trucks and tractors, and pallet jacks) used within the project site are zero-emission from start of operations.

e. The property owner/tenant/lessee shall use the cleanest technologies available and provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on-site.

f. At least 30 days prior to applying for building permits, the property owner/tenant/lessee shall submit plans for review and approval of CDD staff, which include the necessary infrastructure for future use of zero emission vehicles, including both heavy-duty and delivery trucks (e.g., installation of conduit specifically designated for truck charging equipment in the future).

g. Idling is strictly prohibited on the subject property and adjacent streets in the Richmond/San Pablo area. The property owner/tenant/lessee shall inform all truck drivers associated with the business of this prohibition.

h. Applicant/tenant/lessee shall periodically sweep the property to remove road dust, tire wear, brake dust and other contaminants in parking lots.

i. Applicant/tenant/lessee shall not use diesel back-up generators on the property unless absolutely necessary. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Applicant/tenant/lessee shall make every effort to utilize emergency back-up generators that meet CARB's Tier 4 emission standards or have the least emissions.

j. The property owner/tenant/lessee shall monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation.

k. The operation of Transportation Refrigeration Units (TRUs) is prohibited on the subject site. Any proposed use of TRUs at the subject location will require submittal of a Development Plan modification application and subject to review under the California Environmental Quality Act.

O-8.46 Cont.

l. The property owner shall add this Condition of Approval, Air Quality 15, a through l, as part of contractual lease agreement language to ensure the tenant/lessee is informed of all on-going operational responsibilities.

Preferred Truck Route

14. The preferred truck route for all heavy-duty trucks (Class 7 and 8) exiting the site via Brookside Drive is: left turn onto Brookside Drive, left turn at Central Street, right turn on Pittsburg Avenue. The preferred truck route for all heavy-duty trucks exiting the site via Fred Jackson Way is: proceed directly onto Pittsburg Avenue to the Richmond Parkway. Drivers returning to this site shall be instructed to use the same routes outlined above. These preferred truck routes shall be implemented during all on-going business operations and shall be included as part of contractual lease agreement language to ensure the tenants/lessees are made aware of the preferred route for heavy-duty trucks.

Solar Power Generation:

15. At least 30-days prior to applying for a building permit, the applicant shall submit evidence to the CDD staff for review and approval, demonstrating that the subject building(s) have been designed to be solar ready by meeting or exceeding the current California Building Code (e.g., structurally able to support solar panels on roofs, appropriately sized electrical panels and conduit, etc.).

O-8.46 Cont.

16. The project sponsor shall include with the building permit application, sufficient solar panels to provide power for the operation's base power use at the start of operations and as power use demand increases. Project sponsor shall include analysis of (a) projected power requirements at the start of operations and as power demand increases corresponding to the implementation of the "clean fleet" requirements, and (b) generating capacity of the solar installation.

    CDD shall verify the size and scope of the solar project based upon the analysis of the projected power requirements and generating capacity as well as the available solar panel installation space.

    In the event sufficient space is not available on the subject lot to accommodate the needed number of solar panels to produce the operation's base or anticipated power use, the applicant shall demonstrate how all available space has been maximized (e.g., roof, parking areas, etc.). Areas which provide truck movement may be excluded from these calculations unless otherwise deemed acceptable by the supplied reports.

    In the event utility provider review/approval delays do not allow installation/operation of the CDD approved solar panels at the time of final

building inspection (occupancy), the project sponsor shall provide documentation to the CDD for review and approval, demonstrating how all reasonable and normal efforts have been made to procure the necessary permits and install the solar panels.

17. Prior to issuance of the initial building permit, the applicant shall pay the Contra Costa County, Department of Conservation and Development, Current Planning Division, a flat not-to-exceed amount of $500,000 as its fair share contribution towards the cost of planning and/or constructing a Solar Project for the benefit of the North Richmond area. The Solar Project must benefit North Richmond residents as mitigation for the construction of a warehouse project with its associated emissions and truck traffic. The County will work with the District One Supervisor and the North Richmond Community to define and develop the Solar Project.

Biological Resources:

Nesting Bird Surveys

18. Construction work shall take place outside of the February 15 to September 15 bird nesting seasonal window to the maximum extent practicable. If construction is to be conducted during the nesting season, the project applicant is responsible for ensuring that the project does not result in any violation of the Migratory Bird Treaty Act (MBTA) or Fish and Game Code. A qualified Biologist shall conduct focused pre-construction nesting bird surveys throughout the project area no more than 5 days prior to the initiation of on-site project-related activities. Surveys shall be conducted in all potential habitat located at, and adjacent to, project work sites and in staging and storage areas. The minimum survey radii surrounding the work area will be the following: (1) 250 feet for passerines; and (2) 1,000 feet for raptors such as *Buteo spp*. In the event that there is a lapse in construction activities for 7 days or more, a qualified Biologist shall conduct additional focused pre-construction nesting bird surveys in areas of potential habitat again before project activities can be reinitiated. If an active nest is found, the qualified Biologist may consult with the California Department of Fish and Wildlife (CDFW) if needed regarding appropriate action to comply with the Fish and Game Code.

O-8.46 Cont.

- **Active Nest Buffers**. Active nest sites and protective buffer zones will be designated as "ecologically sensitive areas" where no project-related activities or personnel may enter (while occupied or in use for the season in the case of multi clutch bearing species) during the course of nesting bird season with the establishment of a fence barrier or flagging

surrounding the nest site. The qualified Biologist shall determine the necessary buffer, in consultation with CDFW if needed, to protect nesting birds based on existing site conditions, such as construction activity, topography, and line of sight, and shall increase buffers as needed to provide sufficient protection of nesting birds and their natural behaviors.

- **Active Nests**. A qualified Biologist will observe any identified active nests prior to the start of any project-related activities to establish a behavioral baseline of the adults and any nestlings. Once project activities commence, all active nests shall be continuously monitored by a qualified Biologist to detect any signs of disturbance and behavioral changes as a result of the project. In addition to direct impacts, such as nest destruction, nesting birds might be affected by noise, vibration, odors and movement of workers or equipment. If signs of disturbance and behavioral changes are observed, the qualified Biologist shall halt project activities causing that change until the nestlings have fledged, and the nest is determined to be inactive. **(MM BIO-1a)**

19. General Minimization Measures

- **Harassment of Animals**. No project personnel or motorized equipment shall harass, herd, or drive any wildlife. Harass is defined as an intentional act that disrupts an animal's normal behavior patterns, including but is not limited to, breeding, feeding, or sheltering. Project personnel and equipment shall not cause displacement of wildlife into roadways or open areas lacking cover from predators.

- **Allow Wildlife to Leave Unharmed**. Project staff shall allow any wildlife encountered during the course of project activities to leave the project area unharmed.

- **Temporary Flagging, Fencing, and Barriers**. The permittee shall remove all temporary flagging, fencing, and/or barriers from the project area upon completion of project activities.

- **Open Pipes Restriction**. All pipes, culverts, signposts, poles, or similar structures that are staged, stored, or installed at the project area for one or more overnight periods shall be thoroughly inspected for wildlife prior to use in project activities.

- **Open Trenches**. Wildlife escape ramps shall be installed, constructed of wood, or installed as an earthen slope in each open trench, hole, or pit

O-8.46 Cont.

that is capable of allowing large (e.g., deer, coyote) and/or small (e.g., frogs, snakes) wildlife to escape on their own volition. Open trenches, pits, or holes shall be inspected for wildlife prior to the initiation of project activities each day. If wildlife is discovered, it shall be allowed to leave on its own volition, or if necessary, moved by biological staff if applicable. Special-status species shall not be handled without prior consultation from CDFW.

- **Signpost Restriction**. Signposts installed permanently throughout the course of the project shall have the top capped and/or the top three post holes covered or filled with screws or bolts to prevent the entrapment of wildlife.
- **Fencing Restriction**. All fencing installed temporarily or permanently throughout the course of the project, shall not be constructed of materials deleterious to wildlife (e.g., sharp edges exposed at the top or bottom of chain-link fencing, braided wire where birds may become entangled, etc.). No barbed wire, or equivalent, shall be allowed where it may result in harm to birds and other wildlife.
- **Restriction of Nighttime Construction and Artificial Lighting**. Except for construction activities that involve the pouring of concrete and require the use of nighttime lighting, all other project activities shall be terminated 30 minutes before sunset and shall not resume until 30 minutes after sunrise. The permittee shall use sunrise and sunset times established by the Federal Aviation Administration (FAA) found at: https://avcams.faa.gov/sunrise_sunset.php.

No permanent or unattended temporary outdoor lighting shall be used during the course of construction.

0-8.46 Cont.

Cultural Resources and Tribal Cultural Resources:

20. Worker Training, Archaeological Monitoring, and Halt Construction Upon Encountering Historical or Archaeological Materials

Prior to the initiation of construction activities, an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology shall provide Worker Environmental Awareness Program (WEAP) training to construction personnel with an overview of applicable laws, project mitigation measures, and procedures to be followed with regards to historical and/or archaeological resources that may be encountered over the course of the

project. An Archaeologist should be present to monitor all ground-disturbance activities. In the event a potentially significant historical and/or archaeological resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until an Archaeologist has evaluated the situation. The applicant for the proposed project (CenterPoint Properties) shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Potentially significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. The Archaeologist shall make recommendations concerning appropriate measures that shall be implemented to protect the resource, including but not limited to excavation and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Any previously undiscovered resources found during construction within the project site shall be recorded on appropriate California Department of Parks and Recreation (DPR) 523 forms and shall be submitted to Contra Costa County Department of Conservation and Development, the Northwest Information Center (NWIC), and the California Office of Historic Preservation (OHP), as required. **(MM CUL-1)**

0-8.46 Cont.

21. Stop Construction upon Encountering Human Remains

In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and Section 5097.98 shall be followed. If during the course of project construction, there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance within 100 feet of the remains until the County Coroner is contacted to determine whether the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

2. Where the following conditions occur, the landowner or his or her authorized representative shall work with the Coroner to rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD if available or on the project site or off-site where the reburial would not be subject to further subsurface disturbance:

   - The NAHC is unable to identify an MLD or the MLD failed to make a recommendation within 48 hours after being notified by the NAHC.
   - The descendant identified fails to make a recommendation.
   - The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner. **(MM CUL-3)**

22. Native American Construction Monitoring

To minimize the potential for destruction of or damage to existing or previously undiscovered burials, archaeological and Tribal Cultural Resources (TCRs) and to identify any such resources at the earliest possible time during project-related earthmoving activities, the project applicant and its construction contractor(s) shall implement the following measures:

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- Native American Monitors from culturally affiliated Native American Tribes shall be invited to monitor the vegetation grubbing, stripping, grading or other ground-disturbing activities in the project area to determine the presence or absence of any cultural resources. Native American representatives from cultural affiliated Native American Tribes shall act as a representative of their Tribal Government and shall be consulted before any cultural studies or ground-disturbing activities begin.
- Native American representatives and Native American Monitors have the authority to identify sites or objects of significance to Native Americans and to request that work be stopped, diverted, or slowed if such sites or objects are identified within the direct impact area. Only a Native American representative can recommend appropriate treatment of such sites or objects.
- If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or bone, are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the

find until an Archaeologist who meets the Secretary of the Interior' s qualification standards can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the County, the California Office of Historic Preservation (OHP), and other appropriate agencies. Appropriate treatment measures may include development of avoidance or protection methods, archaeological excavations to recover important information about the resource, research, or other actions determined during consultation. **(MM CUL-4a)**

23. Avoidance and Preservation in place of Tribal Cultural Resources

Should Tribal Cultural Resources (TCRs) be discovered during project construction, avoidance and preservation in place is the preferred manner of mitigating impacts to TCRs and shall be accomplished by several means, including:

- Planning construction to avoid TCRs, archaeological sites and/ or other resources; incorporating sites within parks, green-space, or other open space; covering archaeological sites; deeding a site to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity. As noted in Mitigation Measure CUL-4a, appropriate treatment measures may include archaeological excavations to recover information about the resource. Recommendations for avoidance of cultural resources shall be reviewed by the CEQA Lead Agency representative (Contra Costa County), interested Native American Tribes and the appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and environmental considerations, and the extent to which avoidance is consistent with project objectives. If feasible, avoidance and design alternatives may include realignment within the project area to avoid cultural resources, modification of the design to eliminate or reduce impacts to cultural resources or modification or realignment to avoid highly significant features within a cultural resource. Native American representatives from interested Native American Tribes shall be allowed to review and comment on these analyses and shall have the opportunity to meet with the CEQA Lead Agency (Contra Costa County) representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate and feasible avoidance and design alternatives can be identified.

- If the resource can be avoided, the construction contractor(s), with Native

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American Monitors from culturally affiliated Native American Tribes present, shall install protective fencing outside the site boundary, including a buffer area, before construction restarts. The construction contractor(s) shall maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area shall be demarcated as an "Environmentally Sensitive Area." Native American representatives from interested Native American Tribes and the CEQA Lead Agency (Contra Costa County) representative shall also consult to develop measures for long-term management of the resource and routine operation and maintenance within culturally sensitive areas that retain resource integrity, including tribal cultural integrity, and including archaeological material, Traditional cultural properties and cultural landscapes, in accordance with State and federal guidance including National Register Bulletin 30 (Guidelines for Evaluating and Documenting Rural Historic Landscapes), Bulletin 36 (Guidelines for Evaluating and Registering Archaeological Properties), and Bulletin 38 (Guidelines for Evaluating and Documenting Traditional Cultural Properties); National Park Service Preservation Brief 36 (Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes) and using the Advisory Council on Historic Preservation (ACHP) Native American Traditional Cultural Landscapes Action Plan for further guidance. Use of temporary and permanent form of protective fencing shall be determined in consultation with the Native American representatives from interested Native American Tribes. **(MM CUL-4b)**

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<u>Geology and Soils</u>:

24. <u>Prepare Grading and Construction Plans that Incorporate Geotechnical Investigation Recommendations</u>

Prior to issuance of the grading permits for the proposed project, development of the final grading, foundation, and construction plans shall incorporate the site-specific earthwork, foundation, floor slab, finished grades, underground utilities, and pavement design recommendations, as detailed in the Geotechnical Investigation prepared by Cornerstone Earth Group dated August 22, 2018. The applicant shall coordinate with the County Department of Conservation and Development and County Geologist to tailor the grading and foundation plans, as needed, to reduce risk related to known soil and geologic hazards. The final grading, foundation, and construction plans for the proposed project shall be reviewed by the County Department of Conservation and Development and County Geologist. Grading operations shall meet the

requirements of the recommendations included in the Preliminary Geotechnical Investigation prepared by Cornerstone Earth Group. During construction, the County Department of Conservation and Development shall monitor construction of the proposed project to ensure the earthwork operations are properly performed. **(MM GEO-1a)**

25. Prepare Final Construction Report

    The Project Geotechnical Engineer shall prepare a final report that documents the field observations and testing services provided during construction as well as provide a professional opinion on the compliance of construction with the recommendations in the Geotechnical Investigation. The final report can be segmented into an as-graded report that is issued at the end of rough grading, but prior to the installation of the foundations, and a second letter commenting on the inspections made during installation of foundations/parking lot/drainage facilities. The County Department of Conservation and Development will place a hard hold on the final inspection, to ensure that the Geotechnical Engineer's grading-foundation inspection letter-report is provided prior to requesting the final building inspection for each building. **(MM GEO-1b)**

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Greenhouse Gas Emissions:

26. Prior to the issuance of building permits, the project applicant/developer shall demonstrate (e.g., provide building plans) to the satisfaction of the Contra Costa County Department of Conservation and Development, that the proposed buildings are designed and will be built to, at minimum, meet the Tier 2 advanced energy efficiency requirements of the Nonresidential Voluntary Measures of the California Green Building Standards Code, Division A5.2, Energy Efficiency, as outlined under Section A5.203.1.2.2. **(MM GHG-1a)**

27. Prior to issuance of occupancy permits, the project applicant/developer shall demonstrate to the satisfaction of the Contra Costa County Department of Conservation and Development, that the proposed parking areas for passenger automobiles are designed and will be built to accommodate electric vehicle (EV) charging stations. At minimum, the parking shall be designed to accommodate a number of EV charging stations equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.3.2. **(MM GHG-1b)**

28. Prior to issuance of occupancy permits, the project applicant/developer shall demonstrate to the satisfaction of the Contra Costa County Department of Conservation and Development, that the proposed parking areas for passenger automobiles are designed and will be built to provide parking for low-emitting, fuel-efficient, and carpool/van vehicles. At minimum, the number of preferential parking spaces for passenger automobiles shall equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.1.2. **(MM GHG-1c)**
29. To reduce idling emissions from transport trucks, which places restrictions on idling, the project applicant/developer shall have signage placed at truck access gates, loading docks, and truck parking areas that clearly notes idling is strictly prohibited on the subject property. In coordination with Contra Costa County, the project applicant/developer shall also place similar signs in the adjacent streets in the Richmond/San Pablo area. At minimum, each sign placed outside the interior premises of the subject property shall note the idling prohibition on the adjacent streets and include telephone numbers of the building facilities manager and the California Air Resources Board (ARB) to report violations. All signage shall be made of weather-proof materials. All site and architectural plans submitted to the Contra Costa County Department of Conservation and Development shall note the locations of these signs. Prior to issuance of occupancy permits, the Contra Costa County Department of Conservation and Development shall verify compliance with these requirements herein. **(MM GHG-1d)**

30. All landscaping equipment (e.g., leaf blower) used for property management shall be electric-powered only. The property manager/facility owner shall provide documentation (e.g., purchase, rental, and/or services agreement) to the Contra Costa County Department of Conservation and Development to verify, to the County's satisfaction, that all landscaping equipment utilized will be electric-powered. **(MM GHG-1e)**

31. Prior to the issuance of grading and building permits for the proposed project, the project applicant shall provide Contra Costa County with documentation demonstrating that the rooftop photovoltaic system will satisfy 100 percent of operational electricity consumed by the project, including the electricity demand resulting from the electric vehicle (EV) fleet.

    If the rooftop photovoltaic system will not be able to supply the additional electricity demand resulting from the EV fleet charging requirements, the project applicant shall, prior to the issuance of the certificate of occupancy for the proposed project, provide Contra Costa County with documentation

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demonstrating that the additional electricity demand will be supplied with 100 percent carbon-free electricity sources. These sources may include, but are not limited to, Pacific Gas and Electric Company (PG&E) 100 Percent Solar Choice electricity service option or Marin Clean Energy's (MCE) Deep Green 100 percent renewable electricity service option. This documentation shall also demonstrate that 100 percent carbon-free electricity sources will be utilized for the first 30 years of operation.

To monitor and ensure that 100 percent of electricity demand generated by the proposed project is supplied with 100 percent carbon-free electricity sources, the project applicant shall maintain records of all electricity consumption and supply associated with the proposed project's operation for five years and make these records available to the County upon request. **(MM GHG-f)**

32. Prior to the issuance of the certificate of occupancy for the proposed project, the project applicant shall provide the County with documentation demonstrating the purchase of voluntary carbon credits pursuant to the following performance standards and requirements: the carbon offsets shall achieve real, permanent, quantifiable, verifiable, additional and enforceable reductions as set forth in California Health and Safety Code Section 38562(d)(1) and (d)(2) and 17 California Code of Regulations § 95802(a); and one carbon offset credit shall mean the past reduction or sequestration of one metric ton (MT) of carbon dioxide equivalent (CO2e) that is "not otherwise required" (CEQA Guidelines § 15126.4(c)(3)). Such credits shall be purchased through a verified greenhouse gas (GHG) emissions credit broker and (i) shall be registered with, and retired by an Offset Project Registry, as defined in 17 California Code of Regulations § 95802(a), approved by ARB, such as, but not limited to the Climate Action Reserve, American Carbon Registry, or Verra, and (ii) shall be subject to protocols that are ARB-approved as required in 17 California Code of Regulations § 95970 (a)(1)-(2). Such credits shall be in an amount sufficient to offset operational GHG emissions of no less than 3,688 MT CO2e per year starting in 2021, 3,384 MT CO2e per year starting in 2023, 530 MT CO2e per year starting in 2025, 371 MT CO2e per year starting in 2027, and 2,205 MT CO2e per year starting in 2045 for the first 30 years of project operations, based on current estimates of the project related GHG emissions. Alternatively, the project applicant may purchase the total amount estimated over the lifetime of the proposed project (30 years), which is estimated to be 35,112 MT CO2e. The purchase shall be verified as occurring prior to approval of occupancy permits. Copies of emission estimates and offset purchase contract(s) shall be provided to the County for review and approval prior to the issuance of the certificate of occupancy for the proposed project.

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Should the project applicant fail to meet the County's conditions of approval for the proposed project as described in Chapter 2, Project Description, of the Draft EIR, the project applicant shall recalculate the MT CO2e generated by project operation and purchase carbon credits equal to no less than the amount necessary to ensure that project emissions do not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the first year of operation (2021), then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the benchmark year of 2023, then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the benchmark year of 2025, then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the benchmark year of 2027, then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. All carbon credits purchased to offset project emissions shall meet the standards and requirements stated in this mitigation measure and documentation proving the purchase of carbon credits which meet these standards and requirements shall be provided to the County for review and approval. **(MM GHG-1g)**

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33. Prior to issuance of the initial building permit, the applicant shall pay the Contra Costa County, Department of Conservation and Development, Current Planning Division, a flat not-to-exceed amount of $750,000 as its fair share contribution towards the cost of funding an air quality improvement and/or health related project(s) for the benefit of the North Richmond area. The project(s) must benefit sensitive receptors within the North Richmond area as mitigation for

the construction of a warehouse project with its associated emissions and truck traffic. The County will work with the District One Supervisor and the North Richmond Community to fund the project(s).

Hazards and Hazardous Materials:

34. Prepare Soil Management Plan and Health and Safety Plan

Prior to issuance of grading permits, the applicant shall retain a licensed professional to prepare and submit a Soil Management Plan and Health and Safety Plan for review and approval by Contra Costa Environmental Health. These plans shall include the following:

- Site control procedures to control the flow of personnel, vehicles, and materials in and out of the project site.
- Measures to minimize dust generation, stormwater runoff, and tracking soil off-site.
- If excavation de-watering is required, protocols to evaluate water quality and discharge/disposal alternative should be described.
- Protocols for conducting earthwork activities in areas where impacts soil, soil vapor, and/or groundwater are present or suspected. Worker training requirements, health and safety measures, and soil handling procedures shall be described.
- Protocols to be implemented if buried tanks, structures, wells, debris, or unidentified areas of impacted soils are encountered during construction activities.
- Protocols to evaluate the quality of soil suspected of being contaminated so that appropriate mitigation, disposal or reuse alternatives, if necessary, can be determined.
- Procedures to evaluate and document the quality of any soil imported to the project site. Soil containing chemicals exceeding residential (unrestricted use) screening levels or typical background concentrating of metals should not be accepted.
- Methods to monitor excavations for the potential presence of volatile chemical vapors. **(MM HAZ-1)**

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Hydrology and Water Quality:

35. Prepare Final Drainage Plan Prior to Grading

- In accordance with Division 914 of the Contra Costa County Ordinance Code, the project applicant shall collect and convey all stormwater entering and/or originating on this property, without diversion and within an adequate storm drainage facility, to a natural watercourse having definable bed and banks, or to an existing adequate public storm drainage system that conveys the stormwater to a natural watercourse. Any proposed diversions of the watershed shall be subject to hearing body approval. Prior to issuance of a grading permit, the applicant shall submit improvement plans for proposed drainage improvements, and a drainage report with hydrology and hydraulic calculations to the Engineering Services Division of the Public Works Department for review and approval that demonstrates the adequacy of the on-site drainage system and the downstream drainage system. The applicant shall verify the adequacy at any downstream drainage facility accepting stormwater from this project prior to discharging runoff. If the downstream system(s) is not adequate to handle the Existing Plus Project condition for the required design storm, improvements shall be constructed to make the system adequate. The applicant shall obtain access rights to make any necessary improvements to off-site facilities.

- In accordance with Division 1014 of the Contra Costa County Ordinance Code, the applicant shall comply with all rules, regulations, and procedures of the National Pollutant Discharge Elimination System (NPDES) for municipal, construction and industrial activities as promulgated by the California State Water Resources Control Board, or any of its Regional Water Quality Control Boards (San Francisco Bay—Region 2); and

- Submit a Final Stormwater Control Plan and a Stormwater Control Operation and Maintenance Plan (O&M Plan) to the Public Works Department, which shall be reviewed for compliance with the County's NPDES Permit and shall be deemed consistent with the County's Stormwater Management and Discharge Control Ordinance (Division 1014) prior to issuance of a building permit. Improvement Plans shall be reviewed to verify consistency with the Final Stormwater Control Plan and compliance with the Contra Costa Stormwater C.3 Guidebook of the County's NPDES Permit and the County's Stormwater Management and Discharge Control Ordinance (Division 1014) and be designed to discourage prolonged standing/ponding of water on-site. **(MM HYD-3)**

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Noise:

36. Implement Noise Reduction Measures During Construction

    - The construction contractor shall ensure that grading activities shall be restricted to the hours between 7:30 a.m. and 5:30 p.m., Monday through Friday. **(MM NOI-1)**

Transportation:

37. Prior to issuance of the certificate of occupancy, the applicant shall retain a qualified transportation consultant to prepare a project-specific Transportation Demand Management (TDM) Program that could incorporate the following measures, where feasible. The TDM Program shall be reviewed and approved by the County, and the applicant shall implement all approved TDM measures.

    - Commute Trip Reduction Program
    - Ride-sharing Program
    - End of Trip Facilities
    - Last Mile Services
    - New Employee Commute Orientation
    - Preferential Parking Program
    - Employer-Sponsored Vanpool
    - Transportation Network Company (TNC) Partnership
    - Employer-Sponsored Shuttle to/from BART Station(s) or Other Transit Hub
    - Carpool and Vanpool Ride-Matching Services **(MM TRANS-1)**

38. Prior to issuance of the certificate of occupancy for the proposed project, the applicant shall install a median and bulb-outs on Fred Jackson Way along the project frontage, stop signs at the project driveways, and signage prohibiting vehicles from turning left out of the project driveways. **(MM TRANS-2a)**

39. Prior to issuance of the building permit, the applicant shall (1) pay the North Richmond Area of Benefit (AOB) fee and (2) commit to installing one of the following improvements on Fred Jackson Way, Market Avenue, or Chesley Avenue prior to project occupancy:

    - Bulb-outs
    - Elevated crosswalks
    - Speed tables
    - Chicanes **(MM TRANS-2b)**

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40. Prior to the issuance of the certificate of occupancy, the applicant shall install curb ramps where required at all pedestrian walkways and pedestrian connections between the three buildings. The applicant shall install pedestrian crossings on all four approaches of Fred Jackson Way and Brookside Drive (including ADA-compliant pedestrian landing islands). The applicant shall install pedestrian crossings on all four approaches of Fred Jackson Way and Pittsburg Avenue (including ADA-compliant pedestrian landing islands). **(MM TRANS-4a)**

41. Prior to the issuance of the certificate of occupancy, the applicant shall install long-term bicycle parking consistent with County Code Section 82-16.412 and other bicycle amenities (showers, changing rooms, bike repair tools/station, etc.) in a convenient location. **(MM TRANS-4b)**

Landscaping:

42. Final Landscaping Plan: At least 30 days prior to CDD stamp-approval of plans for issuance of a building permit, a final landscape and irrigation plan shall be submitted to the CDD for review and approval. The landscaping plan shall conform to the State's Model Water Efficient Landscape Ordinance or the County's Ordinance, if one is adopted. Prior to requesting a final inspection, the approved landscaping shall be installed and evidence of the installation (e.g., photos) shall be provided for the review and approval of CDD.

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43. Restitution for the removal of (7) code-protected tree:

    a. Planting and Irrigation Plan: Prior to issuance of a grading or building permit, whichever occurs first, the applicant shall submit a tree planting and irrigation plan prepared by a licensed arborist or landscape architect for the review and approval of the Department of Conservation and Development, Community Development Division (CDD). *See the North Richmond Design Guidelines for species and size requirements*.

    b. Required Security to Assure Completion of Plan Improvements: A security shall be provided to ensure that the approved planting and irrigation plan is implemented. Prior to issuance of a building permit, the applicant shall submit a security that is acceptable to the CDD.

44. The Final Landscaping Plan shall include sufficient plantings along the southern property boundary to establish a vegetative screening aimed at blocking dust and particulate matter from migrating southward unabated. The vegetative screening shall include fast growing, tall species (e.g., Italian and Leyland cypress) with a density that will accomplish the goal of capturing the maximum amount of dust and particulate matter feasible (e.g., two or three rows of trees

offset from one another and appropriately spaced).

45. Any proposed tree alteration, removal, or encroachment within a drip line of code-protected trees that are not identified with this permit approval will require submittal of a Tree Permit application for review and consideration by CDD.

46. The applicant shall comply with California Model Water Efficient Landscape Ordinance (Division 2, Title 23, California Code of Regulations, Chapter 2.7, Sections 490 through 495) and/or any applicable State mandated landscape/water related requirements applicable at the time of landscaping installation for the project. To the maximum extent feasible, the project proponent shall use drought tolerant vegetation for the development.

    Project sponsors should be aware that Section 31 of the East Bay Municipal Utility District's (EBMUD) Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the project sponsor's expense. Any questions regarding these requirements can be directed to EBMUD Water Service Planning at (510) 287-1365.

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General Construction:

Construction Period Restrictions and Requirements

47. During construction, the following mitigation measures shall be implemented:

    - All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

    - All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

    - All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

    - All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).

    - All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.

- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Bay Area Air Quality Management District (BAAQMD) phone number shall also be visible to ensure compliance with applicable regulations.

48. Implement the following Emission Reduction Measures into the final design of the project:

- The project sponsor shall require their contractor and subcontractors to fit all internal combustion engines with mufflers which are in good condition.

- A dust and litter control program shall be submitted for the review and approval of the Community Development Division staff. Any violation of the approved program or applicable ordinances shall require an immediate work stoppage. Construction work shall not be allowed to resume until, if necessary, an appropriate construction bond has been posted.

- The applicant shall make a good-faith effort to avoid interference with existing neighborhood traffic flow.

- Transporting of heavy equipment and trucks shall be limited to weekdays between the hours of 8:30 A.M. and 4:30 P.M. and prohibited on Federal and State Holidays.

- The site shall be maintained in an orderly fashion. Following the cessation of construction activity, all construction debris shall be removed from the site.

- All construction activities shall be limited to the hours of 7:00 A.M. to 6:00

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P.M., Monday through Friday, and shall be prohibited on state and federal holidays on the calendar dates that these holidays are observed.

- Prohibit unnecessary idling of internal combustion engines.
- Locate stationary noise generating equipment as far from surrounding residential properties as possible.
- Saturday work may be permissible upon review and approval by CDD staff of a written request by the contractor/developer indicating the circumstances warranting such Saturday work and the nature of the work to be performed.

Debris Recovery:

49. At least 15 days prior to the issuance of a building permit the developer shall demonstrate compliance with the debris recovery program, which requires at least 50 percent of the jobsite debris generated by construction projects of 5,000 square feet or greater to be recycled, or otherwise diverted from landfill disposal.

50. Dumpsters or refuse areas shall be screened from view from any roadway.

51. The Development Plan application was subject to an initial deposit of $116,880.80 that was paid with the application submittal, plus time and material costs if the application review expenses exceed the initial deposit. Any additional fee due must be paid prior to issuance of a building permit, or 60 days of the effective date of this permit, whichever occurs first. The fees include costs through permit issuance and final file preparation. Pursuant to Contra Costa County Board of Supervisors Resolution Number 2013/340, where a fee payment is over 60 days past due, the application shall be charged interest at a rate of ten percent (10%) from the date of approval. The applicant may obtain current costs by contracting the project planner. A bill will be mailed to the applicant shortly after permit issuance in the event that additional fees are due.

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PUBLIC WORKS CONDITIONS OF APPROVAL FOR PERMIT CDDP18-03007 and SUBDIVISION CDMS19-00009

Applicant shall comply with the requirements of Title 8, Title 9 and Title 10 of the Ordinance Code. Any exception(s) must be stipulated in these Conditions of Approval. Conditions of Approval are based on the site plan submitted to the Department of Conservation and Development on August 28, 2018 and Tentative Map received October 29, 2019.

UNLESS OTHERWISE SPECIFIED, COMPLY WITH THE FOLLOWING CONDITIONS OF APPROVAL PRIOR TO ISSUANCE OF A BUILDING PERMIT.

General Requirements:

52. Improvement plans prepared by a registered civil engineer shall be submitted to the Public Works Department, Engineering Services Division, along with review and inspection fees, and security for all improvements required by the Ordinance Code or the conditions of approval of this permit. Any necessary traffic signing and striping shall be included in the improvement plans for review by the Transportation Engineering Division of the Public Works Department.

53. The Parcel Map merging the underlying properties into three parcels shall be approved by the County Board of Supervisors and filed at the County Recorder's Office.

Roadway Improvements:

Fred Jackson Way

54. Applicant shall construct curb, 8-foot wide concrete sidewalk (exclusive of curb width if constructed monolithically) street lights, longitudinal and transverse drainage infrastructure, stormwater management facilities, signage, striping and pavement conforms to existing improvements. In general, the face of curb for these improvements shall be 32-feet east of the ultimate centerline of Fred Jackson Way.

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55. The project is limited to a total of three driveways along the Fred Jackson Way frontage: a main driveway opposite the intersection at Pittsburg Avenue, one between Pittsburg Avenue and Brookside Drive, and one between Pittsburg Avenue and Da Villa Road. Driveways designated for truck access shall be 40-50 feet wide. All others shall be 26 feet wide. Exact location of these northern and southern driveways are subject to review and approval of Public Works.

56. Install curb bulb-outs at the intersection of Pittsburg Avenue, as well as "pork chop" medians and signage near the driveways left-turnout movements from the project site to direct traffic north along Fred Jackson Way or west along Pittsburg Avenue toward Richmond Parkway. **MM TRANS-2a, MM TRANS-2b**

57. Install traffic signals at the intersections of Fred Jackson Way with both Brookside Drive and Pittsburg Avenue. The traffic signal at the Brookside Drive intersection shall allow full turning movements at all approaches. The signal at Pittsburg Avenue will include a separate southbound to west bound right turn

lane, permitted left turns on the northbound and southbound approaches and split phases on the eastbound and westbound approaches. The applicant shall install pedestrian crossings on all four approaches of both signalized intersections, including ADA-compliant pedestrian landing islands as applicable. Construction costs for installation of these signals would be credited against the project's North Richmond AOB fee obligation. **MM TRANS-4**

58. The applicant shall submit a preliminary "sketch" plan to the Public Works Department for review showing all required improvements to the Fred Jackson Way frontage, signalized intersections and nearby offsite County roadway conforms. The sketch plan shall be to scale, show horizontal alignments, transitions, curb lines, and lane striping. It shall provide sight distance at the project driveways for a design speed of 40 miles per hour. Truck turning exhibits should also be included to show accessibility to/from project driveways and potential turning movement conflicts. The plan shall extend a minimum of 175 feet beyond the limits of the proposed work. Final alignment and driveway locations will be subject to Public Works approval based on compatibility with existing and proposed right of way dedications and improvements on adjacent and nearby properties.

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Brookside Drive

59. Applicant shall construct curb, minimum 5-foot sidewalk (excluding width of curb), necessary longitudinal and transverse drainage, stormwater management facilities, street lighting, signage striping, pavement widening and transitions along the entire project frontage of Brookside Drive. Applicant shall construct face of curb 20 feet from the ultimate road centerline.

60. The project is limited to a total of three driveways along Brookside Drive frontage Driveways designated for truck access shall be 40-50 feet wide. All others shall be 26 feet wide. Exact location of these driveways are subject to review and approval of Public Works. Driveways shall incorporate signage and turn restrictions to discourage cut through traffic in residential neighborhoods.

61. The applicant shall submit a preliminary "sketch" plan to the Public Works Department for review showing all required improvements to the Brookside Drive frontage and nearby offsite conforms. Format of said "Plan" shall be as described above relative to Fred Jackson Way.

Off-Site Traffic Mitigation

62. In 2017, the North Richmond Area of Benefit (AOB) traffic mitigation fee program was updated to require new developments within North Richmond to

contribute towards traffic calming strategies to reduce cut-through truck traffic in the neighborhood. Pursuant to Mitigation Measure TRANS-2b, the applicant will be required to develop traffic calming measures for review and approval by the Public Works Department, execute an agreement and post security to construct the identified improvement(s) prior to filing the Parcel Map for the project. The cost of the off-site traffic calming improvements would be counted as work completed and would be provided credit towards the North Richmond AOB fee obligation. As noted above, the two signals required along Fred Jackson Way will be credited to this obligation.

Miscellaneous

63. Any cracked and displaced curb, gutter, and sidewalk within the project's limits of work shall be removed and replaced. Concrete shall be saw cut prior to removal. Existing lines and grade shall be maintained. New curb and gutter shall be doweled into existing improvements.

Access to Adjoining Property:

Proof of Access

64. Applicant shall furnish proof to the Public Works Department of the acquisition of all necessary rights of way, rights of entry, permits and/or easements for the construction of off-site, temporary or permanent, public and private road and drainage improvements.

65. Applicant shall furnish proof to the Public Works Department that legal access to the property is available from Fred Jackson Way and Brookside Drive.

Encroachment Permit

66. Applicant shall obtain an encroachment permit from the Application and Permit Center, if necessary, for construction of improvements within the right of way of Fred Jackson Way, Brookside Drive and Pittsburg Avenue.

Abutter's Rights:

67. Applicant shall restrict access along the Fred Jackson Way and Brookside Drive frontages of this property, with the exception of the access points shown on the applicant's site plan, as specifically approved under these conditions of approval. Owner shall relinquish abutter's rights of access along both frontages with the exception of the access points shown.

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Road Dedications:

68. Property Owner shall convey to the County, by Offer of Dedication, a minimum of ten feet of right of way along the entire Brookside Drive frontage for the planned future half-width of 30 feet from the ultimate centerline. Additional right of way may be necessary to accommodate public utilities.

69. If the applicant opts to separate public street stormwater runoff from the on-site runoff by constructing dual stormwater management facilities, the infrastructure associated with runoff from the public right of way may necessitate additional right of way along Fred Jackson Way and/or Brookside Drive. Property Owner shall convey to the County, by Offer of Dedication, any additional right-of-way necessary for operation and maintenance of stormwater management facilities associated with treatment of runoff from the public right of way.

Access & Utility Easements:

70. Proposed Private Access and Utility Easements between the three subdivision parcels should be delineated on the Parcel Map to provide for internal circulation and access to common driveways and utilities.

O-8.46 Cont.

Da Villa Road

71. Owner shall grant a (generally) 15-foot wide Access and Utility Easement ("PAUE") to the property currently identified as Assessors' Parcel No. 409-300-002 (541 Da Villa Road). Said easement shall lie contiguous to the south property line of the project site (coincident with the north line of the Da Villa Road) and extend from the grantee's property westerly to Fred Jackson Way. To eliminate angle points in the easement, additional easement area may be required to create a centerline alignment for what will effectively be a 40-foot wide Da Villa Road easement that conforms to County collector road standards.

72. Coincident with the above PAUE, owner shall dedicate a non-exclusive Access and Drainage Easement to the Contra Costa County Flood Control and Water Conservation District ("District") to supplement the District's existing access along Da Villa Road and encumber any portions of Line A of Drainage Area 19A to be constructed by this project.

Countywide Street Light Financing:

73. Applicant shall annex to the Community Facilities District (CFD) 2010-1 formed for Countywide Street Light Financing.

Landscaping:

74. If applicable, the applicant shall install and guarantee all SWCP landscaping and automatic irrigation facilities within the public-right-of-way, to be maintained by the County. The landscape facilities shall be maintained by the developer: a) for a minimum of 180 days after installation and b) until the plants have become established.

75. If applicable, the applicant shall submit four sets of landscape and automatic irrigation plans and cost estimates, prepared by a licensed landscape architect, for all SWCP landscaping and automatic irrigation facilities to be maintained by the County to the Public Works Department for review approval, prior to issuance of building permits. Applicant shall pay appropriate fees in accordance with County Ordinance. Landscaping shall meet the requirements of the Contra Costa County Public Works Department Landscaping Design, Construction and Maintenance standards and Guidelines for County Maintained Facilities.

76. All landscaping to be maintained by the property owner shall be submitted to the CDD for review and approval.

77. Applicant shall apply to the Public Works Department for annexation to the Community Facilities District (CFD) No. 2006-1 (North Richmond Area Maintenance Services) for the future maintenance of area wide medians and landscaping. The annexation of property into the CFD must be completed prior to occupancy and the applicant should be aware that the annexation process may take approximately 60 days.

0-8.46 Cont.

Pedestrian Access:

78. Applicant shall design all public and private pedestrian facilities in accordance with Title 24 (Handicap Access) and the Americans with Disabilities Act. This shall include all sidewalks, paths, driveway depressions, and curb ramps.

79. Curb ramps and driveways shall be designed and constructed in accordance with current County standards. A detectable warning surface (e.g. truncated domes) shall be installed on all curb ramps. Adequate right-of-way shall be dedicated at the curb returns to accommodate the returns and curb ramps; accommodate a minimum 4-foot landing on top of any curb ramp proposed.

Parking:

80. "No Parking" signs shall be installed along Fred Jackson Way and Brookside Drive subject to the review of the Public Works Department and the review and approval of the Board of Supervisors.

Utilities/Undergrounding:

81. Applicant shall underground all new and existing utility distribution facilities, including those along the frontage of Fred Jackson Way and Brookside Drive, including the remnant of the overhead utilities on the north side of Brookside Drive east of Fred Jackson Way. The developer shall provide joint trench composite plans for the underground electrical, gas, telephone, cable television and communication conduits and cables including the size, location and details of all trenches, locations of building utility service stubs and meters and placements or arrangements of junction structures as a part of the Improvement Plan submittals for the project. The composite drawings and/or utility improvement plans shall be signed by a licensed civil engineer.

Drainage Improvements:

Collect and Convey

82. The applicant shall collect and convey all stormwater entering and/or originating on this property, without diversion and within an adequate storm drainage system, to *an adequate* natural watercourse having definable bed and banks, or to an existing adequate public storm drainage system which conveys the stormwater to *an adequate* natural watercourse, in accordance with Division 914 of the Ordinance Code.

    The nearest public drainage facilities are Lines A and B of Drainage Area 19A located along the west side of Fred Jackson Way that will convey stormwater run-off from the site to the Wildcat Creek and San Pablo Creek respectively. The Drainage Study included in the DEIR and supplemental documentation reviewed by Public Works indicates these lines have sufficient capacity to satisfy the Ordinance Code requirements. Staff concurs with this preliminary analysis, pending final assessment in conjunction with review of the final construction drawings and documents. **MM HYD-3**

0-8.46 Cont.

Miscellaneous Drainage Requirements:

83. Applicant shall prevent storm drainage from draining across the sidewalk(s) and driveway(s) in a concentrated manner.

84. Private storm drain easements conforming to the width specified in Section 914-14.004 of the County Ordinance Code, shall be conveyed across any storm drain conveyance or management facilities that serve more than one parcel.

85. Applicant shall dedicate Public Storm Drain Easements over any portions of Lines A or B (DA 19A) that traverse the project site that are not otherwise

encumbered in the easement dedicated to the District for the widening of Da Villa Road as described above.

National Pollutant Discharge Elimination System (NPDES):

86. The applicant shall be required to comply with all rules, regulations, and procedures of the National Pollutant Discharge Elimination System (NPDES) for municipal, construction, and industrial activities as promulgated by the California State Water Resources Control Board, or any of its Regional Water Quality Control Boards (San Francisco Bay –Region II).

    Compliance shall include developing long-term best management practices (BMPs) for the reduction or elimination of storm water pollutants. The project design shall incorporate wherever feasible, the following long-term BMPs in accordance with the Contra Costa Clean Water Program for the site's storm water drainage:

    - Minimize the amount of directly connected impervious surface area.
    - Install approved full trash capture devices on all catch basins (excluding catch basins within bioretention basins) as reviewed and approved by Public Works Department. Trash capture devices shall meet the requirements of the County's NPDES permits.
    - Place advisory warnings on all catch basins and storm drains using current storm drain markers.
    - Construct concrete driveway weakened plane joints at angles to assist in directing run-off to landscaped/pervious areas prior to entering the street curb and gutter.
    - Filtering Inlets.
    - The applicant shall sweep the paved portion of the site at least once a year between September 1st and October 15th utilizing a vacuum type sweeper. Verification (invoices, etc.) of the sweeping shall be provided to the County Clean Water Program Administrative Assistant at 255 Glacier Drive, Martinez, CA 94553; (925)313-2238.
    - Trash bins shall be sealed to prevent leakage, OR, shall be located within a covered enclosure.
    - Other alternatives comparable to the above as approved by the Public Works Department. **MM HYD-1**

O-8.46 Cont.

<u>Stormwater Management and Discharge Control Ordinance</u>:

87. The applicant shall submit a FINAL Storm Water Control Plan (SWCP) and a Stormwater Control Operation and Maintenance Plan (O+M Plan) to the Public Works Department, which shall be reviewed for compliance with the County's National Pollutant Discharge Elimination System (NPDES) Permit and shall be deemed consistent with the County's Stormwater Management and Discharge Control Ordinance (§1014) prior to issuance of certificate of occupancy. To the extent required by the NPDES Permit, the Final Stormwater Control Plan and the O+M Plan will be required to comply with NPDES Permit requirements that have recently become effective that may not be reflected in the preliminary SWCP and O+M Plan. All time and materials costs for review and preparation of the SWCP and the O+M Plan shall be borne by the applicant. **MM HYD-3**

    - Improvement Plans shall be reviewed to verify consistency with the final SWCP and compliance with Provision C.3 of the County's NPDES Permit and the County's Stormwater Management and Discharge Control Ordinance (§1014).

    - Stormwater management facilities shall be subject to inspection by Public Works Department staff; all time and materials costs for inspection of stormwater management facilities shall be borne by the applicant.

    - Prior to filing the Parcel Map the property owner(s) shall enter into a standard Stormwater Management Facility Operation and Maintenance Agreement with Contra Costa County, in which the property owner(s) shall accept responsibility for and related to operation and maintenance of the stormwater facilities, and grant access to relevant public agencies for inspection of stormwater management facilities.

    - Prior to filing the Parcel Map the property owner(s) shall annex the subject property into Community Facilities District (CFD) No. 2007-1 (Stormwater Management Facilities), which funds responsibilities of Contra Costa County under its NPDES Permit to oversee the ongoing operation and maintenance of stormwater facilities by property owners.

    - Any proposed water quality features that are designed to retain water for longer than 72 hours shall be subject to the review of the Contra Costa Mosquito & Vector Control District.

O-8.46 Cont.

Area of Benefit Fee Ordinance:

88. The applicant shall comply with the requirements of the Bridge/Thoroughfare Fee Ordinance for the WCC Transit/Pedestrian, WCCTAC Bridge/Road, and North Richmond Areas of Benefit as adopted by the Board of Supervisors. These fees will be collected prior to issuance of building permits on this site.

89. Prior to constructing any public improvements, the applicant, shall contact Public Works Department to determine the extent of any eligible credits or reimbursements against the area of benefit fees.

Drainage Area Fee Ordinance:

90. The applicant shall comply with the drainage fee requirements for Drainage Area 19A as adopted by the Board of Supervisors prior to initiation of the use requested with this application.

91. Certain improvements required by the Conditions of Approval for this development or the County Subdivision Ordinance may be eligible for credit or reimbursement against the drainage area fee. The developer should contact the Public Works Department to determine the extent of any credit or reimbursement for which the developer may be eligible. Any credit or reimbursements shall be determined prior to issuance of a Building Permit or as approved by the Flood Control District.

O-8.46 Cont.

ADVISORY NOTES

ADVISORY NOTES ARE NOT CONDITIONS OF APPROVAL; THEY ARE PROVIDED TO ALERT THE APPLICANT TO ADDITIONAL ORDINANCES, STATUTES, AND LEGAL REQUIREMENTS OF THE COUNTY AND OTHER PUBLIC AGENCIES THAT MAY BE APPLICABLE TO THIS PROJECT.

A. NOTICE OF OPPORTUNITY TO PROTEST FEES, ASSESSMENTS, DEDICATIONS, RESERVATIONS OR OTHER EXACTIONS PERTAINING TO THE APPROVAL OF THIS PERMIT.

   Pursuant to California Government Code Section 66000, et seq., the applicant has the opportunity to protest fees, dedications, reservations or exactions required as part of this project approval. To be valid, a protest must be in writing pursuant to Government Code Section 66020 and must be delivered to the Community Development Division within a 90-day period that begins on the date that this project is approved. If the 90th day falls on a day that the Community Development Division is closed, then the protest must be submitted by the end of the next business day.

B. The applicant may be required to comply with the requirements of the Bridge/Thoroughfare Fee Ordinance for the North Richmond, West Contra Costa

Transportation Advisory Committee (WCCTAC) Bridges/Roads, and WCCTAC Transit/Pedestrian Areas of Benefit Area of Benefit as adopted by the Board of Supervisors.

C. This project may be subject to the requirements of the Department of Fish and Wildlife. It is the applicant's responsibility to notify the California Department of Fish and Wildlife, Bay Delta Region (Region 3), 825 Cordelia Road, Suite 100, Fairfield, CA 94534 of any proposed construction within this development that may affect any fish and wildlife resources, per the Fish and Wildlife Code.

D. This project may be subject to the requirements of the Army Corps of Engineers. It is the applicant's responsibility to notify the appropriate district of the Corps of Engineers to determine if a permit is required, and if it can be obtained.

E. Prior to applying for a building permit, the applicant is strongly encouraged to contact the following agencies to determine if additional requirements and/or additional permits are required as part of the project:

- Contra Costa County Building Inspection Division
- Contra Costa County Grading Division
- Contra Costa County Environmental Health Division
- Contra Costa County Consolidated Fire Protection District
- East Bay Municipal Utility District
- West County Wastewater District
- LAFCO
- City of Richmond
- DTSC

O-8.46 Cont.

APPENDIX F



EXHIBIT 3 - MMRP

MITIGATION MONITORING/REPORTING PROGRAM

FOR THE

MARIPOSA INDUSTRIAL PARK

City of Stockton, CA

State Clearinghouse No: 2020120283
City of Stockton Project No. P20-0805

November 22, 2022

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Cont.

Prepared for:
CITY OF STOCKTON
345 N. El Dorado Street
Stockton, CA 95202
(209) 937-8266

BaseCamp Environmental

1.0 INTRODUCTION

This document is the Mitigation Monitoring/Reporting Program (MMRP) for the Mariposa Industrial Park project, as required by CEQA Guidelines Section 15097. The primary source document for the MMRP is the *Environmental Impact Report for the Mariposa Industrial Park Project* (SCH# 2020120283) (the "EIR"). When referenced as such, the "EIR" for the project includes the Public Review Draft EIR (the DEIR) dated August 24, 2021 and the certified Revised Final EIR (the FEIR) dated November 15, 2022, as well as any documents that have been incorporated into the DEIR and FEIR by reference.

1.1 PURPOSE AND SCOPE OF THIS DOCUMENT

The California Environmental Quality Act (CEQA) requires that a Lead Agency prepare and certify an Environmental Impact Report (EIR) when a proposed project may involve significant environmental effects, as defined by CEQA. Prior to project approval, the Lead Agency must adopt an MMRP that lists all mitigation measures identified in the certified EIR and describes responsibility for their implementation and/or monitoring. The mitigation measures are listed together with implementation and monitoring responsibility in the table following.

CEQA also requires that the Lead Agency make written findings specific to each of the significant environmental effects or potentially significant environmental effects of the project as described in the EIR. The "CEQA Findings" for the Mariposa Industrial Park project, including a Statement of Overriding Considerations, are contained in a separate document to be adopted by the Stockton City Council.

The proposed project, a summary of the project's environmental review process, the environmental documentation prepared for the project, and mitigation measures that must be implemented in conjunction with the project are discussed below.

1.2 PROJECT DESCRIPTION

The proposed project involves annexation and pre-zoning of the project site and approval of plans for industrial development of approximately 203 acres of land located adjacent to and south of Mariposa Road. The project site, consisting of nine parcels, is in the San Joaquin County unincorporated area, adjacent to the southeastern limits of the City of Stockton. The site location is shown on the attached figures.

The project would involve the development of "high-cube" warehousing and storage buildings that are typically 200,000 square feet of floor area or greater. The conceptual site plan for the project site proposes seven buildings with a maximum height of 36 feet and floor area totaling 3.6 million square feet including ancillary office space. Project site

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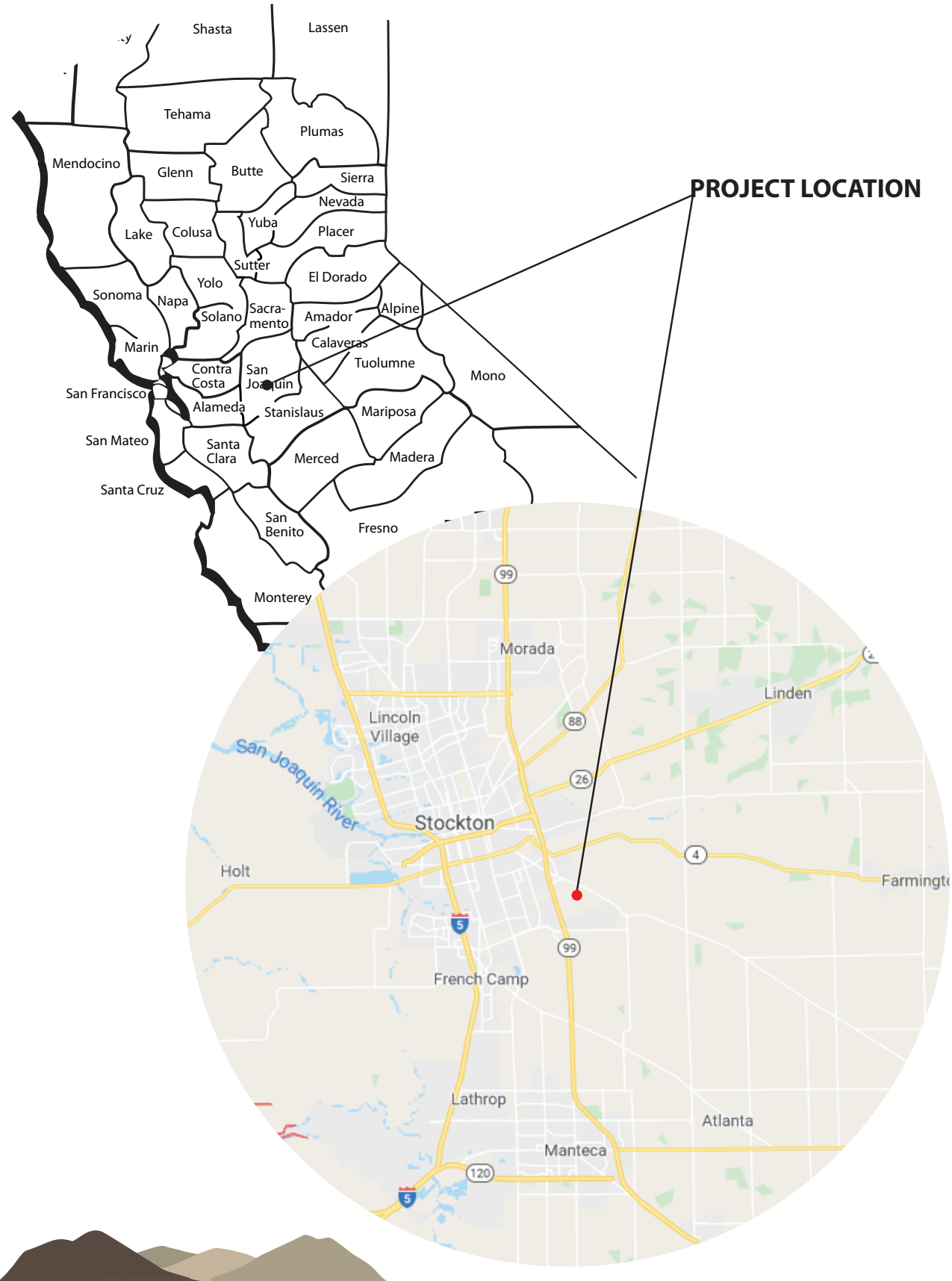
development would also include the construction of circulation and parking for light vehicles and trucks, utilities and landscaping. Access would be developed from Mariposa Road; improvements would include widening of Mariposa Road to accommodate turn pockets and acceleration/deceleration lanes.

1.3 ENVIRONMENTAL REVIEW OF THE PROJECT UNDER CEQA

The project's environmental effects, mitigation measures needed to address these effects and alternatives to the project are discussed in detail the EIR prepared by the City of Stockton in accordance with the requirements of CEQA. EIR processing steps have included preparation and distribution of a Notice of Preparation, a scoping meeting, publication and distribution of a Draft EIR for public review, preparation of a Final EIR addressing comments received during the public review period for City Council certification, and preparation of a CEQA Findings document and this Mitigation Monitoring/Reporting Plan for adoption by the Stockton City Council. Additional detail regarding the CEQA processing of the project can be found in the Revised Final EIR, which is incorporated by reference below.

> Revised Final Environmental Impact Report for the Mariposa Industrial Park Project, Stockton, CA. November 15, 2022. Prepared for City of Stockton Department of Community Development, 345 N. El Dorado Street, Stockton, CA 95202. Prepared by BaseCamp Environmental, Inc., 802 West Lodi Avenue, Lodi, CA 95240. State Clearinghouse Number 2020120283.

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Figure 1
REGIONAL LOCATION MAP

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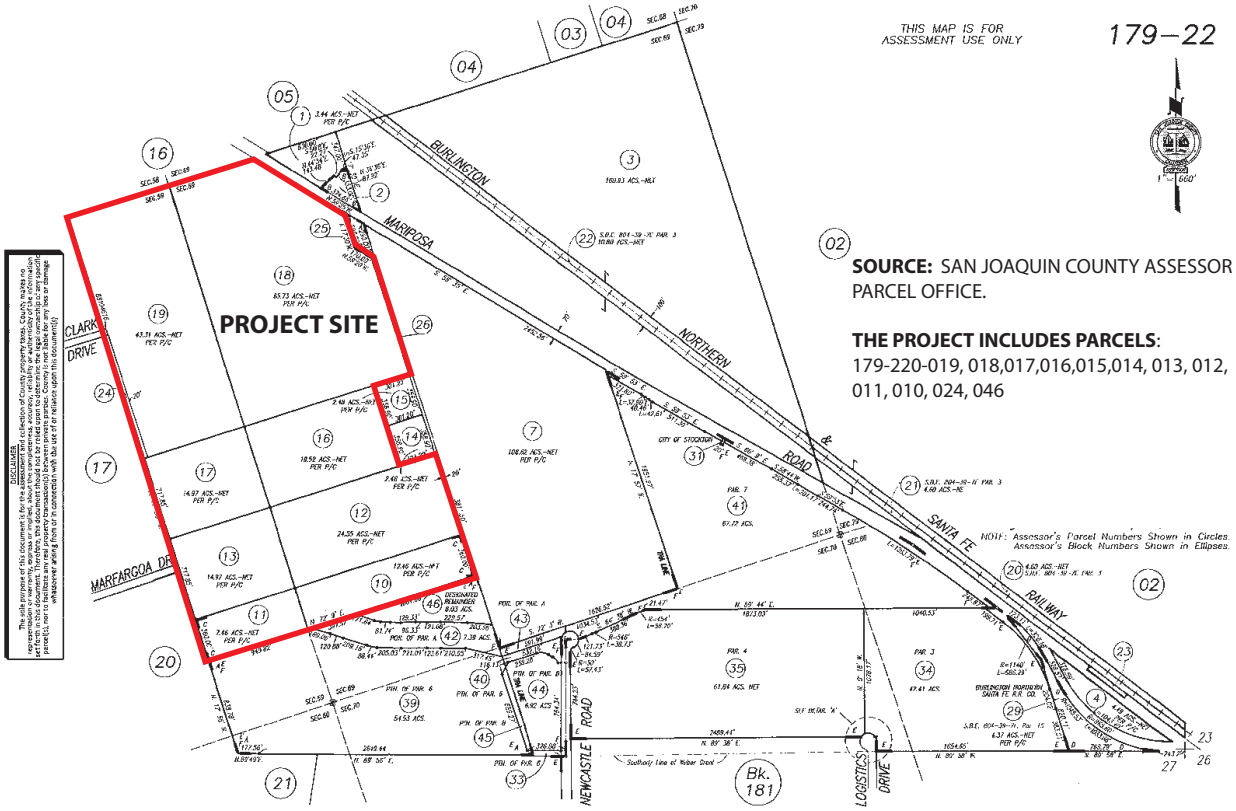
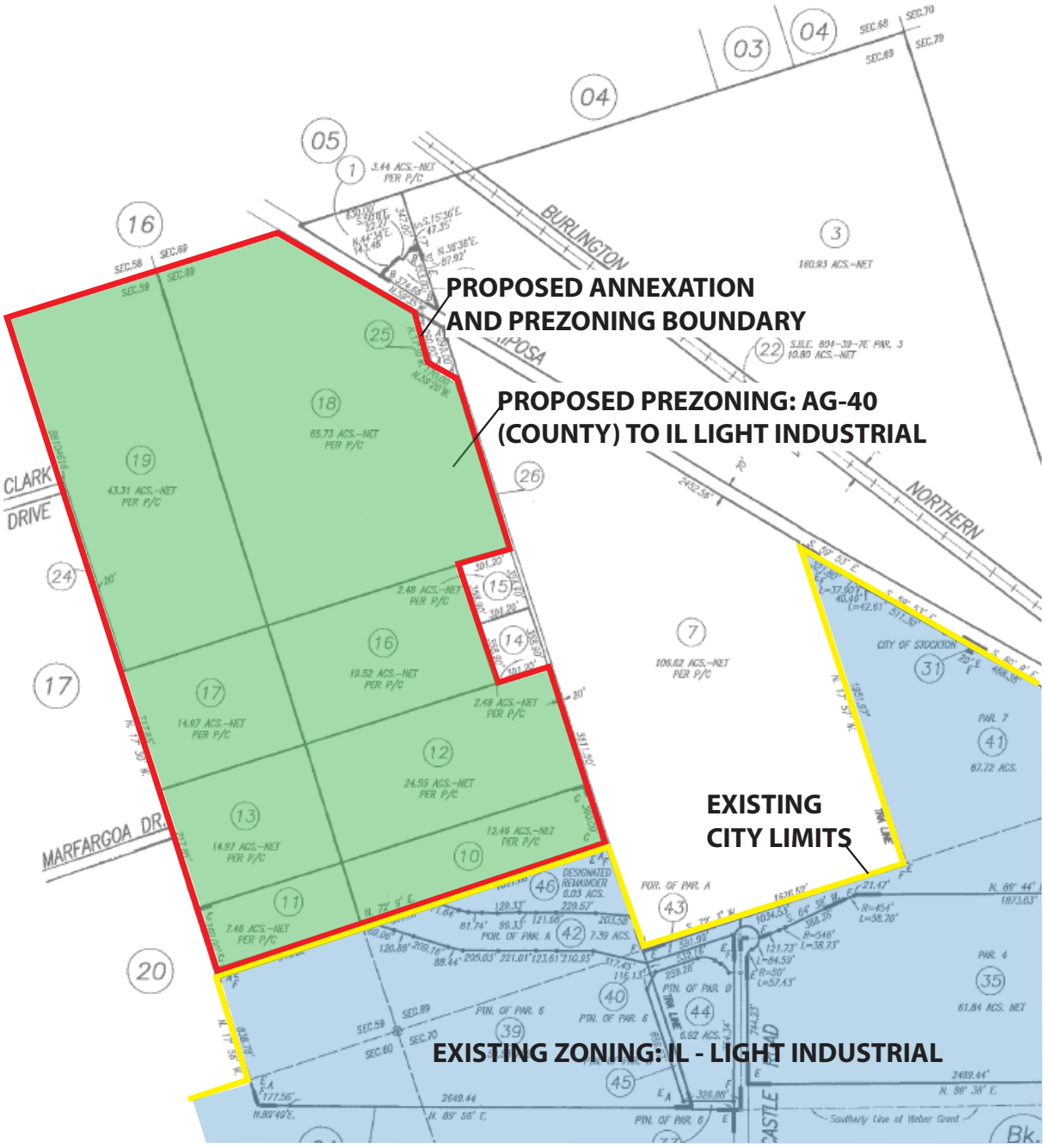


Figure 2
ASSESSOR PARCEL MAP

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BaseCamp Environmental

Figure 3
PROPOSED ANNEXATION AND PREZONING



SOURCE: Ware Malcomb

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Cont.

Figure 4
CONCEPTUAL SITE PLAN

2.0 MITIGATION MONITORING/REPORTING PROGRAM

CEQA requires more than just preparing environmental documents; it also requires the Lead Agency to change or place conditions on a project, or to adopt plans or ordinances for a broader class of projects, which would address the potentially significant or significant environmental effects of a project. To ensure that mitigation measures within the Lead Agency's purview are actually implemented, CEQA requires the adoption of a mitigation monitoring and/or reporting program (MMRP). Specifically, CEQA Guidelines Section 15091(d) requires that a public agency, when making findings for the significant impacts of a project,

> "shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures."

Mitigation measures that are not feasible, or are within the jurisdiction of other agencies, are addressed through the findings required by CEQA Guidelines Section 15091 and shown in the CEQA Findings document for the project.

O-8.47 Cont.

The Revised FEIR for the Mariposa Industrial Park project sets forth a series of mitigation measures that are applicable to the project and will address the potentially significant effects of the project. The following table summarizes the potentially significant environmental effects that could result from approval of the Mariposa Industrial Park project as described in the EIR. The table identifies 1) each effect, 2) how each significant effect would be mitigated, 3) the responsibility for implementation of each mitigation measure, and 4) the responsibility for monitoring of each of the mitigation measures. The table follows the same sequence as the impact analysis in the EIR.

The mitigation measures shown in the table include those arising from the analysis and conclusions of the Draft EIR as well as additional mitigation measures resulting from public and agency comments on the Draft EIR, an initial version of the Final EIR dated February 28, 2022 and further discussion with the comment authors in the months leading up to this publication. The comments received on the EIR and the City's responses to those comments are discussed in Chapter 22.0 of the Revised Final EIR.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
4.0 AESTHETICS		
Impact AES-3: Visual Character and Quality. This is a potentially significant impact.		
AES-1: New structures, landscaping, and site improvements shall conform with Section 5.02 of the City of Stockton Design Guidelines.	Applicant is responsible for incorporating these requirements into project plans and specifications.	CDD Building will be responsible to ensure that subject requirements are included in the approved plans and specifications.
Impact AES-4: Light and Glare. This is a potentially significant issue.		
AES-2: The approved site plan shall conform with the most recent version of the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) adopted by the City of Stockton at the time of site plan approval, including compliance with Section 5.106.8, which establishes mandatory requirements for outdoor lighting systems of nonresidential development that are designed to minimize the effects of light pollution. AES-3: The approved site plan shall comply with the applicable provisions of the Stockton Municipal Code pertaining to lighting, including Sections 16.36.060(B) and 16.32.070, which require exterior lighting to be shielded and directed away from adjoining properties and public rights-of-way. Compliance shall be documented in a photometric (lighting) plan or other documentation acceptable to the City.	Applicant is responsible for incorporating these requirements into project plans and specifications.	CDD Building will be responsible to ensure that subject requirements are included in the approved plans and specifications.

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
AES-4: Prior to final approval, the project shall be submitted to the SanJoaquin Council of Governments (SJCOG), acting in its capacity as the Airport Land Use Commission, for review of the compatibility of the project with Stockton Metropolitan Airport operations and conformance to the guidelines stipulated in the Airport Land Use Compatibility Plan for Stockton Metropolitan Airport.	CDD Planning staff is responsible for submitting project information to ALUC.	CDD Planning will be responsible for ensuring that ALUC review is completed, and any applicable requirements incorporated are into conditions of approval
5.0 AGRICULTURE		
Conversion of Farmland. This is a significant impact.		
AG-1: The project shall participate in and comply with the City's Agricultural Lands Mitigation Program, under which developers of the property shall contribute agricultural mitigation land or shall pay the Agricultural Land Mitigation Fee to the City.	Applicant is responsible for easement dedication or fee payment.	CDD Planning will be responsible for ensuring that agricultural program compliance is completed.
6.0 AIR QUALITY		
Air Quality Plans and Standards – Construction Emissions. This is a potentially significant issue.		
AIR-1: Prior to the issuance of the first building permit, the applicant/developer shall demonstrate compliance with the SJVAPCD Rule 9510 (Indirect Source Review) to reduce growth in both NOx and PM10 emissions, as required by SJVAPCD and City requirements.	Same as AIR-3	Same as AIR-3
AIR-2: The project shall comply with SJVAPCD Regulation VIII for the control of dust emissions during project construction. A project Dust Control Plan shall be	Applicant is responsible for submittal of technical	CDD Planning is responsible for review and acceptance of

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
submitted to the SJVAPCD as required by Regulation VIII. Enforcement of Regulation VIII is the direct responsibility of the SJVAPCD. City Building inspectors shall monitor conformance with approved plans and specifications.	assessment.	assessment
AIR-3: Architectural Coatings: Construction plans shall require that architectural and industrial maintenance coatings (e.g., paints) applied on the project site shall be consistent with a VOC content of <10 g/L. Developer or tenant is not expected to exercise control over materials painted offsite.	Applicant is responsible for submittal of technical assessment.	CDD Planning is responsible for review and acceptance of assessment
AIR-4 SJVAPCD Regulation VIII Compliance: Construction plans and specifications shall include a Dust Control Plan incorporating the applicable requirements of Regulation VIII, which shall be submitted to the SJVAPCD for review and approval prior to beginning construction in accordance with the requirements of Regulation VIII.	Applicant is responsible for compliance with AQ-2 and AQ-3	CDD Planning is responsible for ensuring compliance has been completed.
AIR-5: Construction Worker Trip Reduction: Project construction plans and specifications will require contractor to provide transit and ridesharing information for construction workers.	Applicant is responsible for required analysis	CDD Planning is responsible for review and acceptance of analysis
AIR-6: Construction Meal Destinations: Project construction plans and specifications will require the contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service.	Applicant is responsible for Rule 9510 compliance and submittal of documentation to the City.	CDD Planning is responsible for ensuring compliance has been completed.

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
AIR-7: To reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available off-road construction equipment, including the latest tier equipment (recommended by SJVAPCD).	Applicant is responsible for Regulation VIII compliance and submittal of documentation to the City.	CDD Planning is responsible for ensuring Regulation VIII compliance has been completed.
Air Quality Plans and Standards- Operational Emissions. This is a significant issue.		
	See AIR-3	See AIR-3
AIR-8: The project shall comply with the emission reduction requirements of SJVAPCD Rule 9510 for project operations.	Applicant is responsible for preparation and submittal of Dust Control Plan	SJVAPCD is responsible for review and approval of Dust Control Plan.
AIR-9: Prior to building occupancy, employers with 100 or more eligible employees shall submit an Employer Trip Reduction Implementation Plan (ETRIP) to the City for review and approval, as required by SJVAPCD Rule 9410. A copy of the ETRIP shall be provided to the SJVAPCD. Employers shall facilitate participation in the implementation of the ETRIP by providing information to its employees explaining methods for participation in the Plan and the purpose, requirements, and applicability of Rule 9410.	Applicant is responsible for preparation and submittal of ETRIP	CDD Planning is responsible for review and acceptance of ETRIP
AIR-10: The project shall comply with SJVAPCD Rule 4101, which prohibits emissions of visible air contaminants to the atmosphere and applies to any source operation that emits or may emit air contaminants.	Applicant and CDD Planning will responsible for VERA discussion and decision.	CDD Planning will be responsible for ensuring that VERA discussion occurred.

0-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
AIR-11: The project shall comply with SJVAPCD Rule 4601, which limits project has agreed to abide by more stringent VOC emissions requirements. emissions of volatile organic compounds from architectural coatings by specifying storage, clean up and labeling requirements.	Applicant is responsible for incorporating these requirements into project plans and specifications.	CDD Building will be responsible to ensure that subject requirements are included in plans and specifications.
AIR-12: The project shall comply with SJVAPCD Rule 4601, which limits emissions of volatile organic compounds from architectural coatings by specifying storage, clean up and labeling requirements. (The project has agreed to abide by more stringent VOC emissions requirements.	See Construction AIR-1	See Construction AIR-1
AIR-12: Solar Power: Owners, operators or tenants shall include with the building permit application, sufficient solar panels to provide power for the operation's base power use at the start of operations and as base power use demand increases. Project sponsor shall include analysis of (a) projected power requirements at the start of operations and as base power demand increases corresponding to the implementation of the "clean fleet" requirements, and (b) generating capacity of the solar installation.	Applicant is responsible for incorporating these requirements into project plans and specifications.	CDD Building will be responsible to ensure that subject requirements are included in plans and specifications.
AIR -12 (continued): CDD shall verify the size and scope of the solar project based upon the analysis of the projected power requirements and generating capacity as well as the available solar panel installation space. The photovoltaic system shall include a battery storage system to serve the facility in the event of a power outage to the extent required by the 2022 or later California Building Standards Code. AIR -12 (continued): In the event sufficient space is not available on the subject lot to accommodate the needed number of solar panels to produce the operation's base or anticipated power use, the applicant shall demonstrate how all available space has been maximized (e.g., roof, parking areas, etc.). Areas which provide truck movement may be excluded from these calculations unless otherwise deemed acceptable by the supplied reports.	Applicant is responsible for compliance and submittal of documentation	CDD Planning is responsible for review and acceptance of documentation

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
AIR -12 (continued): The developer or tenant, or qualified solar provider engaged by the developer or tenant shall timely order all equipment and shall install the system when the City has approved building permits and the necessary equipment has arrived. The developer or tenant shall commence operation of the system when it has received permission to operate from the utility. The photovoltaic system owner shall be responsible for maintaining the system(s) at not less than 80% of the rated power for 20 years. At the end of the 20-year period, the building owner shall install a new photovoltaic system meeting the capacity and operational requirements of this measure, or continue to maintain the existing system, for the life of the project.		
AIR -13: Emission Standards for Heavy-Duty Trucks: The following mitigation measures shall be implemented during all on-going business operations and shall be included as part of contractual lease agreement language to ensure the tenants/lessees are informed of all on-going operational responsibilities. The property owner/tenant/lessee shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025 or whencommercially available for the intended application, whichever date is later. A zero-emission vehicle shall ordinarily be considered commercially available if the vehicle is capable of serving the intended purpose and is included in California's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project, https://californiahvip.org/ or listed as available in the US on the Global Commercial Vehicle Drive to Zero inventory, https://globaldrivetozero.org/. The City shall be responsible for the final determination of commercial availability and may (but is not required to) consult with the California Air Resources Board before making such final determination. In order for the City to make a determination that such vehicles are commercially unavailable, the operator must submit documentation from a minimum of three (3) EV dealers identified on the californiahvip.org website demonstrating the inability to obtain the required EVs or equipment needed	Applicant or tenant is responsible for compliance and submittal of documentation	CDD Planning is responsible for review and acceptance of documentation

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
within 6 months "Domiciled at the project site shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii)dedicated to the project site (defined as more than 70% of the truck routes(during the calendar year) that start at the project site even if parked or kept elsewhere) Zero-emission heavy-duty trucks which require service can be temporarily replaced with model year 2014 or later trucks. Replacement trucks shall be used for only the minimum time required for servicing fleet trucks.		
AIR-14: Zero Emission Vehicles: The property owner/tenant/lessee shall utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2023, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2025, and (iv) 100% of thefleet will be zero emission vehicles by December 31, 2027. "Domiciled at the project site" shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere). Zero-emission vehicles which require service can be temporarily replaced with alternate vehicles. Replacement vehicles shall be used for only the minimum time required for servicing fleet vehicles. The property owner/tenant/lessee shall not be responsible to meet "clean fleet" requirements for vehicles used by common carriers operating under their own authority that provide delivery services to or from the project site.	Applicant or tenant is responsible for compliance and submittal of documentation	CDD Planning is responsible for review and acceptance of documentation

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
AIR-15: Demonstrate Compliance with Clean Fleet Requirements: The applicant, property owner, tenant, lessee, or other party operating the facility (the "Operator") shall utilize the zero emission vehicles/trucks required to meet the "clean fleet" requirements in AIR-13 (for Class 7 and 8 vehicles) and AIR-14 (for Class 2 through 6 vehicles) above. Within30-days of occupancy, the Operator shall demonstrate to the satisfaction of CDD staff, that the applicable clean fleet requirements are being met. AIR-15 (continued): In the event that vehicles/trucks are not commercially available for the intended application, the "clean fleet requirements" may be adjusted as minimally as possible by the CDD to accommodate the unavailability of commercially available vehicles/trucks. AIR-15 (continued): The City shall quantify the air pollution and GHG emissions resulting from any modification of this condition. Within 12 months of failing to meet a "clean fleet" requirement the property owner/tenant/lessee shall implement a Voluntary Emissions Reduction Agreement (VERA) providing pound for pound mitigation of the criteria pollutant, toxic air contaminants, and GHG emissions quantified by the City through a process that develops, funds, and implements emission reduction projects, with the Air District serving a role of administrator of the emission reduction projects and verifier of the successful mitigation effort. The VERA shall prioritize projects in the South Stockton and surrounding area. Property owner/tenant/lessee shall continue to fund the VERA each year in an amount necessary to achieve pound for pound mitigation of emissions resulting from not meeting the clean fleet requirements until the owner/tenant/lessee fully complies. AIR-15 (continued): The Operator shall implement the proposed measures after CDD review and approval. Any extension of time granted to implement this condition shall be limited to the shortest period of time necessary to allow for 100% electrification under the clean fleet requirements. The CDD staff may seek the recommendation of the California Air Resources Board in determining whether there has been a manufacturing disruption or insufficient vehicles/trucks	Applicant or tenant is responsible for compliance and submittal of documentation	CDD Planning is responsible for review and acceptance of documentation

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
commercially available for the intended application.		
AIR-16: Condition of Approved Compliance Report: The Operator shall submit a condition of approval compliance report within30 days of, but not later than, the following dates: December 31, 2023, December 31, 2025, and December 31, 2027. The report shall outline clean fleet requirements applicable at each report interval and include documentation demonstrating compliance with each requirement. The City shall consider each report at a noticed publichearing and determine whether the Operator has complied with the applicable clean fleet requirements. If the Operator has not met each 100% clean fleet requirement by December 31, 2027, then the Operator shall submit subsequent reports every year until the 100% clean fleet requirement is implemented. The City shall consider each subsequent report at a noticed public hearing and determine whether the Operator has complied with the clean fleet requirements, including any minimal adjustments to the requirements by the CDD to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks, as described in the previous paragraph. Notice of the above hearings shall be provided to all properties located within 1,000 feet of the project site and through the ASK Stockton list serve. AIR-16 (continued): After the 100% clean fleet requirement has been implemented and confirmed by the CDD, the Operator shall submit to the CDD an on-going compliance report every three years containing all necessary documentation to verify that the Operator is meeting the clean fleet requirements. At the time it confirms that the 100% clean fleet requirement has been implemented, the CDD will establish the due date for the first on-going compliance report. Each subsequent on-going compliance report shall be due within 30 days of, but not later than, the three-year anniversary of the preceding due date. The on-going compliance reports and accompanying documentation shall be made available to the public upon request.	Applicant or tenant is responsible for preparation of compliance reports	CDD Planning is responsible for review and acceptance of compliance reports
AIR-17: Zero Emission Forklifts, Yard trucks and Yard Equipment: Owners, operators or tenants shall require all forklifts, yard trucks, and other equipment used	Tenant or owner is responsible for use of	CDD Planning will be responsible for review and

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
for on-site movement of trucks, trailers and warehoused goods, as well as landscaping maintenance equipment used on the site, to be electrically powered or zero-emission. The owner, operator or tenant shall provide on-site electrical charging facilities to adequately service electric vehicles and equipment.	complying equipment.	acceptance of compliance reports
AIR-18: Truck Idling Restrictions: Owners, operators or tenants shall be required to make their best effort to restrict truck idling onsite to a maximum of three minutes, subject to exceptions defined by CARB in the document: *commercial_vehicle_idling_requirements_July 2016*. Idling restrictions shall be enforced by highly-visible posting at the site entry, posting at other on-site locations frequented by truck drivers, conspicuous inclusion in employee training and guidance material and owner, operator or tenant direct action as required.	Tenant or owner is responsible for enforcement and signage.	CDD Planning will be responsible for review and acceptance of compliance reports
AIR-19: Electric Truck Charging: At all times during project operation, owners, operators or tenants shall be required to provide electric charging facilities on the project site sufficient to charge all electric trucks domiciled on the site and such facilities shall be made available for all electric trucks that use the project site.	Tenant or owner is responsible for use of complying equipment.	CDD Planning will be responsible for review and acceptance of compliance reports
AIR-20: Project Operations, Food Service: Owners, operators or tenants shall establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to operations employees.	Tenant or owner will be responsible for establishment of food service locations.	CDD Planning will be responsible for review and acceptance of compliance reports
AIR-21: Project Operations, Employee Trip Reduction: Owners, operators or tenants shall provide employees transit route and schedule information on systems serving the project area and coordinate ridesharing amongst employees.	Tenant or owner will be responsible for provision of the required information.	CDD Planning will be responsible for review and acceptance of compliance reports.
AIR-22: Yard Sweeping: Owners, operators or tenants shall provide periodic yard and parking area sweeping to minimize dust generation.	Tenant or owner will be responsible for periodic yard sweeping.	CDD Planning will be responsible for review and acceptance of compliance reports

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
AIR-23: Diesel Generators: Owners, operators or tenants shall prohibit the use of diesel generators, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards	Tenant or owner will be responsible for compliance with prohibition.	CDD Planning will be responsible for review and acceptance of compliance reports
AIR-24: Truck Emission Control: Owners, operators or tenants shall ensure that trucks or truck fleets domiciled at the project site be model year 2014 or later, and maintained consistent with current CARB emission control regulations	Tenant or owner will be responsible for truck fleet records, inspection and maintenance.	CDD Planning will be responsible for review and acceptance of compliance reports
AIR-25: SmartWay: Owners, operators or tenants shall enroll and participate the in SmartWay program for eligible businesses	Tenant or owner will be responsible for SmartWay participation.	CDD Planning will be responsible for review and acceptance of compliance reports
AIR-26: Designated Smoking Areas: Owners, operators or tenants shall ensure that any outdoor areas allowing smoking are at least 25 feet from the nearest property line.	Tenant or owner will be responsible for smoking area designation.	CDD Planning will be responsible for review and acceptance of compliance reports
AIR-27: Project construction shall be subject to all adopted City building codes, including the adopted Green Building Standards Code, version July 2022 or later. Prior to the issuance of building permits, the applicant/developer shall demonstrate (e.g., provide building plans) that the proposed buildings are designed and will be built to, at a minimum, meet the Nonresidential Voluntary Measures of the California Green Building Standards code, Divisions A5.1, 5.2 and 5.5, including but not limited to the Tier 2 standards in those Divisions, where applicable, such as the Tier 2 advanced energy efficiency requirements as outlined under Section A5.203.1.2.	Applicant is responsible for incorporating these requirements into project plans and specifications.	CDD Building will be responsible to ensure that subject requirements are included in plans and specifications.
AIR-28: All tenant lease agreements for the project site shall include a provision requiring the tenant/lessee to comply with all applicable requirements of the MMRP, a copy of which shall be attached to each tenant/lease agreement.	Applicant is responsible for incorporating these requirements into project	CDD Building will be responsible to ensure that subject requirements are included in plans and

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
	plans and specifications.	specifications.
Exposure of Sensitive Receptors to Criteria Pollutants. This is a significant issue.		
AIR-29: The project applicant, to reduce carbon monoxide concentrations to an acceptable level, shall contribute fair-share costs to an improvement on the Mariposa Road and Carpenter Road intersection that would widen the northeast-bound Carpenter Road approach to include an exclusive northeast-bound-to northwest-bound left-turn lane, and a combined through/right-turn lane. (See also Transportation Improvement Measure TRANS-2 in Chapter 16.0, Transportation.) Implement all mitigation measures for Impact: AIR-2, Mitigation Measures #s AIR-8 through AIR-28.	The applicant will be responsible for payment of fair share costs. As provided in the referenced mitigation measures	The Department of Public Works will be responsible for ensuring that fair share costs are paid prior to approval of improvement plansAs provided in the referenced mitigation measures
7.0 BIOLOGY		
Special-Status Species and Habitats. This is a potentially significant issue.		
BIO-1: The developer shall apply to the San Joaquin Council of Governments (SJCOG) for coverage under the San Joaquin County Multi-Species Open Space and Habitat Conservation Plan (SJMSCP). The project site shall be inspected by the SJMSCP biologist, who will recommend which Incidental Take Minimization Measures (ITMMs) set forth in the SJMSCP should be implemented. The project applicant shall pay the required SJMSCP fee, if any, and be responsible for the implementation of the specified ITMMs. Setbacks along North Littlejohns Creek shall be as specified in the SJMSCP- approved buffer reduction.	The applicant will be responsible for submitting the SJMSCP coverage application, payment of required fees and implementation of ITMMs. The ODS' Engineer will be responsible for incorporating ITMM requirements in the	CDD Planning will verify that SJMSCP coverage has been obtained and that other mitigation measures have been implemented as required by ITMMs.

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
	project plans and specifications. The Contractor will be responsible for adherence to the plans and specifications, hiring a qualified biologist if required and implementing the biologist recommendations.	
Waters of the U.S. and Wetlands. This is a potentially significant issue		
BIO-2: Prior to the start of construction work in the area where seasonal wetlands have been identified, the project developer shall conduct a wetland delineation identifying jurisdictional Waters of the U.S. and wetlands. The delineation shall be verified by the U.S. Army Corps of Engineers (Corps). The delineation shall be used to determine if any project work will encroach upon any jurisdictional water, thereby necessitating an appropriate permit. For any development work that may affect a delineated jurisdictional Water, the project developer shall obtain any necessary permits from the U.S. Army Corps of Engineers prior to the start of development work within these locations. Depending on the Corps permit issued, the project applicant shall also apply for a Section 401 Water Quality Certification from the Central Valley Regional Water Quality Control Board. If the seasonal wetlands are avoided, or if phased development occurs in areas where no wetlands have been identified, then this mitigation measure does not apply.	The applicant will be responsible for obtaining the required wetland delineation and verification, for proposing adequate mitigation, for obtaining required permits and providing proof of issuance to the City.	The CDD Planning will be responsible for ensuring that the wetland delineation has been completed, required permits have been issued and that specified mitigation measures are incorporated into project plans and specifications.
BIO-3: Prior to the start of construction work in North Littlejohns Creek, the project developer shall obtain any necessary permits from the California Department of Fish and Wildlife and the Central Valley Flood Protection Board. The project developer shall comply with all conditions attached to any required permit.	The applicant will be responsible for obtaining the required permits and providing proof of issuance to the City.	The CDD Planning will be responsible for ensuring that required permits have been issued.

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
BIO-4:Prior to the start of construction work in the area where seasonal wetlands have been identified, the project developer shall obtain any necessary Waste Discharge Requirements from the Central Valley Regional Water Quality Control Board. Pursuant to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan, the filling of seasonal wetlands containing vernal pool invertebrates shall be delayed until the wetlands are dry and SJCOG biologists can collect the surface soils from the wetlands, to store them for future use on off-site seasonal wetland creation on SJCOG preserve lands. If the seasonal wetlands are avoided, then this mitigation measure does not apply.	The applicant will be responsible for obtaining Waste Discharge Requirements if necessary and for timing of fill in coordination with the SJCOG biologists.	The CDD Planning will be responsible for ensuring that Waste Discharge Requirements have been obtained and that seasonal wetland fill is coordinated with SJCOG.
Fish and Wildlife Migration		
Implementation of Mitigation Measure BIO-1.	As provided for BIO-1	As provided for BIO-1
Local Biological Requirements. This is a potentially significant issue.		
BIO-5: If removal of any oak tree on the project site is required, a certified arborist shall survey the oak trees proposed for removal to determine if they are Heritage Trees as defined in Stockton Municipal Code Chapter 16.130. The arborist report with its findings shall be submitted to the City's Community Development Department. If Heritage Trees are determined to exist on the property, removal of any such tree shall require a permit to be issued by the City in accordance with Stockton Municipal Code Chapter 16.130. The permittee shall comply with all permit conditions, including tree replacement at specified ratios.	The applicant will be responsible for surveying oak trees to be removed, preparation of an arborist report and obtaining permits for removal of Heritage trees, if any.	The CDD Planning will be responsible for review of the arborist report and ensuring that any necessary tree removal permits have been obtained.
Habitat Conservation Plans. This is a potentially significant issue.		
Implement Mitigation Measure BIO-1.	As provided for BIO-1	As provided for BIO-1
8.0 CULTURAL RESOURCES		

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
Archaeological and Tribal Cultural Resources. This is a potentially significant issue.		
CULT-1: As noted, the field surveys conducted by Solano Archaeological Services on the project site led to the recording of two potential historical resources: three transmission lines and the remains of a well. Both resources were evaluated on the criteria for listing on the California Register of Historical Resources (see Regulatory Framework above). Neither were determined to meet any of the criteria for such listing. Since these criteria are very similar to those for listing on the National Register of Historic Places, the resources also would not meet criteria for listing on the National Register of Historic Places. As such, the two resources are not considered to have historical value. The project would have no impact on historical resources. It should be noted that the project is unlikely to affect the three transmission lines in any case.	The applicant will be responsible for incorporating these requirements in the project plans and specifications. The Contractor will be responsible for reporting discoveries to the City, for hiring a qualified archaeologist to analyze the discovery and coordinate with Native American tribes as necessary, and for implementing the archaeologist's treatment recommendations.	CDD Planning will be responsible for ensuring that cultural resource requirements have been incorporated into project plans and specifications and that discovery reports are properly documented.
Impact CULT-2: Archaeological and Tribal Cultural Resources . This is a potentially significant issue.		
CULT-1: If any subsurface archaeological resources, including human burials and associated funerary objects, are encountered during construction, all construction activities within a 50-foot radius of the encounter shall be immediately halted until a qualified archaeologist can examine these materials and evaluate their significance. The City shall be immediately notified in the event of a discovery. If burial resources or tribal cultural resources are discovered, the City shall notify the appropriate tribal representative, who may examine the materials with the	The applicant and contractor will be responsible for suspending construction activity if human remains are encountered, reporting finds to the City and County Coroner and	CDD Planning will be responsible for responding to reports of burial or human remain finds as required, including notification of and coordination with Native American representatives.

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
archaeologist and advise the City as to their significance. The archaeologist, in consultation with the tribal representative if contacted, shall recommend mitigation measures needed to reduce potential cultural resource effects to a level that is less than significant in a written report to the City, with a copy to the tribal representative. The City shall be responsible for implementing the report recommendations. Avoidance is the preferred means of disposition of tribal cultural resources. The contractor shall be responsible for retaining qualified professionals, implementing recommended mitigation measures, and documenting mitigation efforts in written reports to the City. CULT-2: The project shall comply with the provisions of the City of Stockton Municipal Code Section 16.36.050. If a historical or archaeological resource or human remains may be impacted by the project, the Secretary of the Cultural Heritage Board shall be notified, any survey needed to determine the significance of the resource shall be conducted, and the proper environmental documents shall be prepared. CULT-3: In the event that archaeological resources are discovered during any construction, construction activities shall cease, and the Community Development Department shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may occur in compliance with State and federal law.	retaining a qualified archaeologist to evaluate the find and provide a written report to the City. The City will be responsible for notifying Native American representatives and for overseeing compliance with Public Resources Code requirements.	
9.0 GEOLOGY, SOILS, AND MINERAL RESOURCES		
Impact GEO-1: Faulting and Seismicity. This is a potentially significant issue.		
GEO-1: The project shall obtain a Notice of Intent issued by the SWRCB for	Applicant will be	CDD Building and Public

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
compliance with the Construction General Permit. The project shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) including a site map, description of construction activities and identification of Best Management Practices (BMPs) that will prevent soil erosion and discharge of other construction-related pollutants	responsible for all activities related to the Construction General Permit and incorporation of these standards in project plans and specifications.	Works will be responsible for ensuring that project has complied with Construction General Permit
GEO-2: The project applicant shall comply with Stockton Municipal Code Section 15.48.050, which requires construction activities to be designed and conducted to minimize discharge of sediment and all other pollutants and Section 15.48.070, which contains standards for implementation of Best Management Practices.		
Impact GEO-3: Soil Erosion. This is a potentially significant issue.		
GEO-3: The project applicant shall submit a geologic soils report, prepared by a registered civil engineer, in compliance with Stockton Municipal Code Section 16.192.020. The report's recommendations shall be incorporated into the final design and construction plans.	Applicant will be responsible for submittal of the soils report.	CDD Building will be responsible for review and approval of the geotechnical report and project plans and specifications.
GEO-4: Project plans and specifications shall comply with the most recent version of the California Building Code adopted by the City of Stockton at the time of project approval.	Applicant will be responsible for preparation of plans and submittal of conforming plans and specifications.	CDD Building will be responsible for review of project plans and specifications.
Impact GEO-5: Paleontological Resources and Unique Geological Features. This is a potentially significant issue.		
GEO-5: If any subsurface paleontological resources are encountered during construction, all construction activities within a 50-foot radius of the encounter shall be immediately halted until a qualified paleontologist can examine these	The ODS will be responsible for incorporating	The City will be responsible for ensuring that paleontology requirements

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
materials, initially evaluate their significance and, if potentially significant, recommend measures on the disposition of the resource. The City shall be immediately notified in the event of a discovery. The contractor shall be responsible for retaining qualified professionals, implementing recommended mitigation measures, and documenting mitigation efforts in written reports to the City.	requirements in project plans and specifications. The ODS contractor will be responsible for suspending construction activity if paleontological resources are encountered, reporting finds to the City and retaining a qualified paleontologist to evaluate the find and provide a written report to the City.	have been incorporated into project plans and specifications and that discovery reports are properly documented.
10.0 GREENHOUSE GAS EMISSIONS		
Impact GHG-1: Project GHG Construction Emissions and Consistency with Applicable Plans and Policies. This is a potentially significant impact.		
GHG-1: The project shall implement the Off-Road Vehicles Best Management Practices specified in the Stockton Climate Action Plan. At least three (3) percent of the construction vehicle and equipment fleet shall be powered by electricity. Construction equipment and vehicles shall not idle their engines for longer than three (3) minutes. AIR-2: The project applicant shall comply, as applicable, with the provisions of the California Air Resources Board's Regulation for In-Use Off-Road Diesel Fueled	The applicant will be responsible for incorporating these requirements in the project plans and specifications. The contractor will be responsible for	The CDD Planning will be responsible for overseeing implementation of these requirements and review and acceptance of written reports.

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
Fleets, which applies to all self-propelled off-road diesel vehicles 25 horsepower or greater used in California and most two-engine vehicles (except on-road two-engine sweepers). These provisions include imposing limits on idling and requiring a written idling policy. It also requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or by installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). AIR-1: Comply with SJVAPCD Rule 9510 for project construction. AIR-2: Comply with SJVAPCD Regulation VIII for the control of dust emissions, submit a project Dust Control Plan. AIR-3: Architectural Coatings: VOC content of <10 g/L. AIR-4: Comply with SJVAPCD: AIR-5: Provide transit and ridesharing information for construction workers. AIR-6: Contractor to locations for food or catering truck service to construction workers. AIR-7: Use cleanest available off-road construction equipment (recommended by SJVAPCD).	periodically reporting compliance with these conditions to the Community Development Department.	
Impact GHG-2: Project GHG Operational Emissions and Consistency with Applicable Plans and Policies. This is a potentially significant impact.		
AIR-8: Comply with SJVAPCD Rule 9510 requirements for project operations. AIR-9: Employers with 100 employees shall submit an Employer Trip	As provided in Chapter 6.0 Air Quality	As provided in Chapter 6.0 Air Quality

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility

Reduction Implementation Plan (ETRIP) to the City for review and approval.

AIR-10: Comply with SJVAPCD Rule 4101prohibiting emissions of visible air contaminants.

AIR-11: Comply with SJVAPCD Rule 4601 limiting VOC emissions from architectural coatings.

AIR-12: Buildings to be solar ready, and install solar panels to provide power for operational base power use.

AIR-13: Emission standards for heavy-duty trucks (Class 7 and 8) domiciled on the project site, clean vehicle requirements.

AIR-14: Zero Emission Vehicles: Emission standards for vehicles/delivery vans/trucks (Class 2 through 6), clean vehicle requirements.

AIR-15: Demonstrate compliance with "clean fleet" requirements in AMM-2 and AMM-3 within 30-days of occupancy. Operator shall submit Clean Fleet condition of approval compliance report at December 31, 2023, 2025 and 2027, tri-annually afterward. In the event of a disruption in clean fleet supply, the applicant will implement a Voluntary Emissions Reduction Agreement (VERA).

AIR-16: Submittal of Clean Fleet condition of approval compliance report within 30 days of, but not later than, the following dates: December 31, 2023, December 31, 2025, and December 31, 2027.

AIR-17: Requirement for forklifts, yard trucks and yard equipment, all zero emission.

AIR-18: Limit truck idling to a maximum of three minutes.

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility

AIR-19: Operators to provide electric truck charging facility.

AIR-20: Operators to provide locations for food or catering truck service.

AIR-21: Operators to provide employees with alternative commute information.

AIR-22: Yard Sweeping: Operators to provide periodic yard and parking area sweeping to minimize dust generation.

AIR-23: Diesel Generators: Operators shall prohibit the use of diesel generators.

AIR-24: Emission controls for trucks or truck fleets domiciled at the project site.

AIR-25: Operators participate in EPA SmartWay.

AIR-26: Operators shall designate smoking areas at least 25 feet from the nearest property line.

AIR-27: Project construction is subject to adopted City building codes, including adopted Green Building Standards Code, Tier 2 advanced energy efficiency requirements for specified divisions.

AIR-28: All tenant lease agreements for the project site shall include a provision requiring the tenant/lessee to comply with all applicable requirements of the MMRP, a copy of which shall be attached to each tenant/lease agreement.

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
11.0 HAZARDS		
Impact HAZ-1: Hazardous Material Transportation and Storage. This is a potentially significant issue.		
HAZ-1: New business on the project site that may handle quantities of hazardous materials equal to or greater than 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of a compressed gas at any given time shall submit a Hazardous Materials Business Plan to the Certified Unified Program Agency (CUPA) of San Joaquin County. The Hazardous Materials Business Plan shall include an inventory of hazardous materials and hazardous wastes and an emergency response plan for incidents involving hazardous materials and wastes. HAZ-2: Proposed business uses that involve the manufacture, storage, handling, or processing of hazardous materials in sufficient quantities that would require s Hazardous Materials Business Plan and the use is within 1,000 feet of a residential zoning district, the project shall comply with Stockton Municipal Code Section 16.36.080, which governs use, handling, storage, and transportation of hazardous materials.	Applicant will be responsible for compliance with hazardous material regulations.	The San Joaquin County CUPA will be responsible for monitoring compliance.
Impact HAZ-2: Hazardous Materials Release. This is a potentially significant issue.		
GEO-1: The project shall obtain a Notice of Intent issued by the SWRCB for compliance with the Construction General Permit. The project shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) including a site map, description of construction activities and identification of Best Management Practices (BMPs) that will prevent soil erosion and discharge of other construction-related pollutants.	Applicant will be responsible for all activities related to the Construction General Permit.	CDD Building and Public Works will be responsible for ensuring that project has complied with Construction General Permit
GEO-2: The project applicant shall comply with Stockton Municipal Code Section 15.48.050, which requires construction activities to be designed and conducted to minimize discharge of sediment and all other pollutants and Section 15.48.070,	Applicant will be responsible for incorporation of these	CDD Building and Public Works will be responsible for ensuring that project has

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
which contains standards for implementation of Best Management Practices.	standards in project plans and specifications.	complied with Construction General Permit
Impact HAZ-4: Airport Hazards. This is a potentially significant issue.		
HAZ-3: The project shall be submitted to the San Joaquin County Airport Land Use Commission for review of project-associated objects that exceed 100 feet in height	CDD Planning staff is responsible for submitting project information to ALUC.	CDD Planning will be responsible for ensuring that ALUC review is completed, and requirements incorporated into conditions of approval
12.0 HYDROLOGY AND WATER QUALITY		
Impact: HYDRO -1: Surface Water Resources and Quality. This is a potentially significant issue.		
Implement storm water quality protections described in GEO-HYDRO-1: Industrial uses on the project shall obtain coverage under the Central Valley RWQCB Industrial General Permit program and implement pollution control measures using the best available technology economically achievable and best conventional pollutant control technology. All facility operators shall prepare, retain on site, and implement a SWPPP implementing applicable Industrial General Permit requirements, including a monitoring program.	As described in GEO-1 Applicant will be responsible for obtaining coverage under the Industrial General Permit.	As described in GEO-1 Municipal Utilities will be responsible for ensuring that Industrial Permit coverage is obtained.
13.0 LAND USE AND PLANNING		

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
There are no potentially significant or significant impacts in this issue area.		
14.0 NOISE		
Increase in Noise Levels in Excess of Standards-Traffic. This is a significant issue.		
NOISE-1: The applicant, the City of Stockton and other project developers impacting Mariposa Road traffic shall consider the use of noise-reducing pavement and utilize it where feasible in planned widening projects for Mariposa Road.		
Increase in Noise Levels in Excess of Standards-Other Project Noise. This is a potentially significant issue		
NOISE-2: Sound walls and/or berms 10 feet in height shall be required where existing residential uses or residentially zoned areas are located adjacent to the project site. Figure 3 of the project noise study (Figure 14-2 of ~~this EIR~~ the DEIR) shows the locations of the recommended sound walls based on the proposed conceptual plan. Where openings in sound walls occur for access or emergency access, solid gates shall be installed. 10-foot sound walls are expected to provide a 10 dB reduction in noise levels. Site plan modifications, and/or additional noise analysis by a qualified acoustical consultant may warrant changes to these requirements, assuming that compliance with City noise standards is maintained. NOISE-3: Project operation shall at all times comply with the provisions of Stockton Municipal Code Chapter 16.60, including: Section 16.60.040, which states that new or expanded commercial, industrial, and	The applicant will be responsible for incorporating noise wall requirements in the project plans and specifications. The ODS will be responsible for retaining a noise consultant to review and recommend alternative noise wall requirements as appropriate.	The CDD Planning will be responsible for ensuring that noise wall requirements are met in project plans and specifications and for review and approval of any proposed noise wall modifications,

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Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
other land use-related noise sources shall mitigate their noise levels such that they do not adversely impact noise-sensitive land uses (e.g., residences) and do not exceed City noise standards.		
Increase in Noise Levels in Excess of Standards-Construction. This is a potentially significant issue.		
NOISE-4: Construction activities associated with the project shall adhere to the requirements of the City of Stockton Municipal Code with respect to hours of operation. The applicant shall ordinarily limit construction activities to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday. No construction shall occur on Sundays or national holidays without a written permit from the City. All construction equipment shall be in good working order and shall be fitted with factory-equipped mufflers. NOISE-5: Project construction comply with the provisions of Stockton Municipal Code Chapter 16.60, including: Section 16.60.030, which contains restrictions on construction noise, including operating or causing the operation of tools or equipment on private property used in alteration, construction, demolition, drilling, or repair work between the hours of 10:00 p.m. and 7:00 a.m. so that the sound creates a noise disturbance across a residential property line, except for emergency work of public service utilities. [Proposed EIR mitigation measure NOISE-2 more restrictive on construction days and hours.	The applicant will be responsible for incorporating these requirements in the project plans and specifications. The Contractor will be responsible for conformance with noise requirements.	The CDD Planning will be responsible for monitoring compliance with these requirements.

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
15.0 PUBLIC SERVICES AND RECREATION		
Impact PSR-1: Fire Protection Services. This is a potentially significant issue.		
PSR-1: Project buildings shall include an Early Suppression, Fast Response (ESFR) fire sprinkler system.	Applicant will be responsible for design and installation of the ESFR system	CDD Building will be responsible for checking plans for and inspection of the required system
PSR-2: City departments, including Fire, Community Development, and Finance, together with industrial project proponents, shall develop and implement a plan for financing, construction and staffing of a new fire station in the vicinity of the project site. Development and implementation of the plan will involve a multi-year process helping the Department meet increasing service demands and to reduce response times. The project applicant shall contribute to the costs of constructing and staffing the new fire station in accordance with the adopted plan.	Stockton Fire will be responsible overseeing new fire station and CFD process	
16.0 TRANSPORTATION		
TRANS-1: Motor Vehicle Transportation Plans – Intersections. Level of significance is not applicable under LOS analysis.		
TRANS-1: The project applicant should contribute fair-share costs to an improvement on the Mariposa Road and 8th Street/Farmington Road intersection that would split the northeast-bound combined through/right-turn lane into an exclusive northeast-bound through lane and a "free" northeast-bound-to-southeast-bound right-turn lane. Existing pavement width is considered adequate to accommodate this improvement.	The applicant will be responsible for design and install of "end of trip" facilities.	CDD Planning will be responsible for ensuring plans and specs include required facilities

O-8.47 Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
TRANS-2: The project applicant should contribute fair-share costs to an improvement on the Mariposa Road and Carpenter Road intersection that would widen the northeast-bound Carpenter Road approach to include an exclusive northeast-bound-to northwest-bound left-turn lane, and a combined through/right-turn lane. (See also Mitigation Measure AIR-1 in Chapter 6.0, Air Quality.)	Owner or tenant will be responsible for implementing vanpool or shuttle program and submittal of documentation to the city	CDD Planning will be responsible for verifying that program is in place an operating
TRANS-2: Motor Vehicle Transportation Plans - Roadway Segments. Level of significance is not applicable under LOS analysis.		
TRANS-3: The project applicant should contribute fair-share costs to an improvement on the segment of Mariposa Road from SR 99 to 8th Street/Farmington Road that would widen the portions of this roadway segment that are currently one lane in each direction to two lanes in each direction.	Owner or tenant will be responsible for implementing vanpool or shuttle program and submittal of documentation to the city	CDD Planning will be responsible for verifying that program is in place an operating
TRANS-6: Consistency with CEQA Guidelines Section 15064.3(b). Level of significance is not applicable under LOS analysis.		
TRANS-1: The project shall provide "end-of-trip" facilities for bicycle riders to encourage the use of bicycling as a viable form of travel to destinations, especially to work. End-of-trip facilities shall include showers, secure bicycle lockers, and changing spaces. TRANS-2: The project shall implement an employer-sponsored vanpool or shuttle. A vanpool will usually service employees' commute to work, while a shuttle will service nearby transit stations and surrounding commercial centers.	Owner or tenant will be responsible for implementing vanpool or shuttle program and submittal of documentation to the city	CDD Planning will be responsible for verifying that program is in place an operating

O-8.47 Cont.

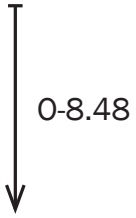
Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
Employer-sponsored vanpool programs entail an employer purchasing or leasing vans for employee use, and often subsidizing the cost of at least program administration. Scheduling is within the employer's purview, and rider charges shall be set on the basis of vehicle and operating cost. TRANS-3: The project shall implement SJVAPCD Rule 9410. Rule 9410, which requires employers with at least 100 employees to implement a trip reduction/transportation demand management program, or ETRIP. [See Air Quality section above.] ETRIP requirements are consistent with a Commute Trip Reduction program recommended by the traffic impact study as a mitigation measure. See also EIR Mitigation Measures TRANS-1 and TRANS-2, which require "end-of-trip" facilities and an employer-sponsored vanpool or shuttle.		
17.0 UTILITIES AND ENERGY		
Impact UTIL-4: Solid Waste. This is a potentially significant impact.		

O-8.47
Cont.

Impact/Mitigation Measures	Implementation Responsibility	Monitoring/Reporting Responsibility
UTIL-1: As a Condition of Approval, the project applicant shall comply with the provisions of Stockton Municipal Code Sections 8.28.020 through 8.28.070 regarding construction and demolition waste. Permit applicants for the project shall be required to meet the waste diversion requirement of at least 50 percent of materials generated as discards by the project, regardless of whether the permit applicant performs the work or hires contractors, subcontractors, or others to perform the work.	Applicant will be responsible for compliance with construction waste recycling requirements.	CDD Building will be responsible for overseeing construction waste recycling.
Impact UTIL-6: Project Energy Consumption. This is a potentially significant impact.		
UTIL-2: As a Condition of Approval, the project applicant shall comply with the most recent version of the California Energy Code adopted by the City of Stockton at the time of project approval. AIR-9: Employers with 100 employees shall submit an Employer Trip Reduction Implementation Plan (ETRIP) to the City for review and approval. AIR-12: Buildings to be solar ready, and install solar panels to provide power for operational base power use.	Applicant will be responsible for incorporating Energy Code requirements in project plans and specifications.	CDD Building will be responsible for review and approval of building plans and specifications.

O-8.47 Cont.

APPENDIX G



DocuSign Envelope ID: 440205DF-A281-45CB-BF15-211C45B14006

ORDINANCE NO. 1891

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF FONTANA, CALIFORNIA AMENDING CHAPTER 9 OF THE FONTANA MUNICIPAL CODE TO REVISE ARTICLE V FOR MODIFICATIONS AND CLARIFICATION TO BUFFERING AND SCREENING REQUIREMENTS, METHODS TO IMPROVE TRAFFIC CIRCULATION, REQUIREMENTS FOR ALTERNATIVE ENERGY, AND IMPROVEMENTS TO CONSTRUCTION REQUIREMENTS AS IT RELATES TO INDUSTRIAL COMMERCE CENTERS THROUGHOUT THE CITY.

WHEREAS, the City of Fontana (the "City") is a municipal corporation, duly organized under the constitution and laws of the State of California; and

WHEREAS, on or about May 7, 2021, the governing board of the South Coast Air Quality Management District ("SCAQMD") adopted Rule 2305, the Warehouse Indirect Source Rule ("Rule 2305"); and

WHEREAS, Rule 2305 requires warehouses greater than 100,000 square feet to directly reduce nitrogen oxide and diesel particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities; and

O-8.48 Cont.

WHEREAS, SCAQMD has also adopted Rule 402 prohibiting emissions that cause injury and/or annoyance to a substantial number of people, including odors; Rule 403 requiring dust control measures during construction; Rule 1113 requiring the use of low Volatile organic compounds ("VOC") paints and coatings; Rule 1186 requiring use of SCAQMD certified street sweepers; and Rule 2202 requiring establishment of rideshare programs for facilities employing more than 250 employees; and

WHEREAS, the California Air Resources Board ("CARB") adopted Rule 2485 restricting diesel engine idling to five minutes or less; and

WHEREAS, California Building Standards Commission adopted Part 11, Title 24 of the California Code of Regulations, known as CALGreen, which generally requires low energy use features, low water use features, all-electric vehicle ("EV") parking spaces and charging facility accommodation, carpool/vanpool parking spaces, and short-term and long-term bicycle parking facilities; and

WHEREAS, the City of Fontana currently regulates industrial commerce centers in Specific Plans, Chapter 30 of the Zoning and Development Code, and in Chapter 9, and Article V (Industrial Commerce Centers Sustainability Standards) of the Municipal Code. Furthermore, Ordinance No. 1879 that established Article V in Chapter 9 of the Municipal Code was adopted by City Council on February 8, 2022; and

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WHEREAS, the City initiated Municipal Code Amendment (AMD) No. 21-001R1 amend Chapter 9 (Environmental Protection and Resource Extraction) of the Municipal Code to modify Article V to revise Industrial Commerce Centers Sustainability Standards, which includes modifications and clarification to buffering and screening requirements, methods to improve traffic circulation, requirements for alternative energy, and improvements to construction as it relates to industrial commerce centers throughout the city; and

WHEREAS, December 21, 2021, the City Council held the second reading and adopted Ordinance No. 1879 for Municipal Code Amendment (AMD) No. 21-001 to add Article V to establish sustainability standards for industrial commerce centers throughout the city; and

WHEREAS, On March 22, 2022, the City Council held a duly noticed public hearing on Municipal Code Amendment (AMD) No. 21-001R1, and the supporting documents in evidence, the City Council found that the Municipal Code Amendment is in conformance with General Plan and does not change any of the Land Use Designation of any properties and it is consistent with the General Plan and furthers Action B of Goal 3 in Chapter 12 to promote renewable energy programs for government, Fontana businesses, and Fontana residences; and

WHEREAS, a notice of the public hearing was published in the local *San Bernardino County Sun* newspaper on Saturday, March 12, 2022 and posted at City.

0-8.48 Cont.

THE CITY COUNCIL OF THE CITY OF FONTANA DOES ORDAIN AS FOLLOWS:

Section 1. The above recitals are true and correct and are fully incorporated herein.

Section 2. Article V of Chapter 9 of the Fontana Municipal Code is hereby amended and renumbered follows:

ARTICLE V. – Industrial Commerce Centers Sustainability Standards

Sec. 9-70. – Applicability.

This Article is applicable to all Warehouse uses throughout the city, as defined in Section 30-12 of Chapter 30, Article 1, Division 4; and as listed as a type of "Warehousing Use" in Table No. 30-530 and includes all warehouse uses in Specific Plans. The following sections shall supersede any existing requirements in the Municipal Code and Specific Plans.

Sec. 9-71. – Buffering and Screening / Adjacent uses.

(1) For any Warehouse building larger than 50,000 square feet in size, a ten-foot-wide landscaping buffer shall be required, measured from the property line of all adjacent sensitive receptors. For any Warehouse

building larger than 400,000 square feet in size, a twenty-foot-wide landscaping buffer shall be required, measured from the property line of all adjacent sensitive receptors. The buffer area(s) shall include, at a minimum, a solid decorative wall(s) of at least ten feet in height, natural ground landscaping, and solid screen buffering trees, as described below, unless there is an existing solid block wall. For any Warehouse building equal to or less than 50,000 square feet in size, a solid decorative wall(s) of at least ten feet in height shall be required when adjacent to any sensitive receptors. Sensitive receptor shall be defined as any residence including private homes, condominiums, apartments, and living quarters, schools, preschools, daycare centers, in-home daycares, health facilities such as hospitals, long term care facilities, retirement and nursing homes, community centers, places of worship, parks (excluding trails), prisons, and dormitories.

(2) Trees shall be used as part of the solid screen buffering treatment. Trees used for this purpose shall be evergreen, drought tolerant, minimum 36-inch box, and shall be spaced at no greater than 40-feet on center. The property owner and any successors in interest shall maintain these trees for the duration of ownership, ensuring any unhealthy or dead trees are replaced timely as needed.

O-8.48 Cont.

(3) All landscaping shall be drought tolerant, and to the extent feasible, species with low biogenic emissions. Palm trees shall not be utilized.

(4) All landscaping areas shall be properly irrigated for the life of the facility to allow for plants and trees to maintain growth.

(5) Trees shall be installed in automobile parking areas to provide at least 35% shade cover of parking areas within fifteen years. Trees shall be planted that are capable of meeting this requirement.

(6) Unless physically impossible, loading docks and truck entries shall be oriented away from abutting sensitive receptors. To the greatest extent feasible, loading docks, truck entries, and truck drive aisles shall be located away from nearby sensitive receptors. In making feasibility decisions, the City must comply with existing laws and regulations and balance public safety and the site development's potential impacts to nearby sensitive receptors. Therefore, loading docks, truck entries, and drive aisles may be located nearby sensitive receptors at the discretion of the Planning Director, but any such site design shall include measures designed to minimize overall impacts to nearby sensitive receptors."

(7) For any Warehouse building larger than 400,000 square feet in size, the building's loading docks shall be located a minimum of 300 feet away, measured from the property line of the sensitive receptor to the nearest

dock door which does not exclusively serve electric trucks using a direct straight-line method.

Sec. 9-72. – Signage and Traffic Patterns.

(1) Entry gates into the loading dock/truck court area shall be positioned after a minimum of 140 feet of total available stacking depth inside the property line. The stacking distance shall be increased by 70 feet for every 20 loading docks beyond 50 docks. Queuing, or circling of vehicles, on public streets immediately pre- or post-entry to an industrial commerce facility is strictly prohibited unless queuing occurs in a deceleration lane or right turn lane exclusively serving the facility.

(2) Applicants shall submit to the Engineering Department, and obtain approval of, all turning templates to verify truck turning movements at entrance and exit driveways and street intersection adjacent to industrial buildings prior to entitlement approval. Unless not physically possible, truck entries shall be located on Collector Streets (or streets of a higher commercial classification), and vehicle entries shall be designed to prevent truck access on streets that are not Collector Streets (or streets of a higher commercial classification), including, but not limited to, by limiting the width of vehicle entries.

O-8.48 Cont.

(3) Anti-idling signs indicating a 3-minute diesel truck engine idling restriction shall be posted at industrial commerce facilities along entrances to the site and in the dock areas and shall be strictly enforced by the facility operator.

(4) Prior to issuance of certificate of occupancy facility operators shall establish and submit for approval to the Planning Director a Truck Routing Plan to and from the State Highway System based on the City's latest Truck Route Map. The plan shall describe the operational characteristics of the use of the facility operator, including, but not limited to, hours of operations, types of items to be stored within the building, and proposed truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors, to the greatest extent possible. The plan shall include measures, such as signage and pavement markings, queuing analysis and enforcement, for preventing truck queuing, circling, stopping, and parking on public streets. Facility operator shall be responsible for enforcement of the plan. A revised plan shall be submitted to by the Planning Director prior to a business license being issued by the City for any new tenant of the property. The Planning Director shall have discretion to determine if changes to the plan are necessary including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.

(5) Signs and drive aisle pavement markings shall clearly identify the on-site circulation pattern to minimize unnecessary on-site vehicular travel.

(6) Facility operators shall post signs in prominent locations inside and outside of the building indicating that off-site parking for any employee, truck, or other operation related vehicle is strictly prohibited. City may require facility operator to post signs on surface or residential streets indicating that off-site truck parking is prohibited by City ordinance and/or the Truck Routing Plan.

(7) Signs shall be installed at all truck exit driveways directing truck drivers to the truck route as indicated in the Truck Routing Plan and State Highway System.

(8) Signs shall be installed in public view with contact information for a local designated representative who works for the facility operator and who is designated to receive complaints about excessive dust, fumes, or odors, and truck and parking complaints for the site, as well as contact information for the SCAQMD's on-line complaint system and its complaint call-line: 1-800-288-7664. Any complaints made to the facility operator's designee shall be answered within 72 hours of receipt.

(9) All signs under this Section shall be legible, durable, and weather-proof.

(10) Prior to issuance of a business license, City shall ensure for any facility with a building or buildings larger than 400,000 total square feet, that the facility shall include a truck operator lounge equipped with clean and accessible amenities such as restrooms, vending machines, television, and air conditioning."

0-8.48 Cont.

Sec. 9-73. – Alternative Energy.

(1) On-site motorized operational equipment shall be ZE (zero emission).

(2) All building roofs shall be solar-ready, which includes designing and constructing buildings in a manner that facilitates and optimizes the installation of a rooftop solar photovoltaic (PV) system at some point after the building has been constructed.

(3) The office portion of a building's rooftop that is not covered with solar panels or other utilities shall be constructed with light colored roofing material with a solar reflective index ("SRI") of not less than 78. This material shall be the minimum solar reflective rating of the roof material for the life of the building."

(4) On buildings over 400,000 square feet, prior to issuance of a business license, the City shall ensure rooftop solar panels are installed and operated in such a manner that they will supply 100% of the power needed to operate all non-refrigerated portions of the facility including the parking areas.

(5) At least 10% of all passenger vehicle parking spaces shall be electric vehicle (EV) ready, with all necessary conduit and related appurtenances installed. At least 5% of all passenger vehicle parking spaces shall be equipped with working Level 2 Quick charge EV charging stations installed and operational, prior to building occupancy. Signage shall be installed indicating EV charging stations and specifying that spaces are reserved for clean air/EV vehicles. Unless superior technology is developed that would replace the EV charging units, facility operator and any successors in interest shall be responsible for maintaining the EV charging stations in working order for the life of the facility.

(6) Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide chilled, cooled, or freezer warehouse space, a conduit shall be installed during construction of the building shell from the electrical room to 100% of the loading dock doors that have potential to serve the refrigerated space. When tenant improvement building permits are issued for any refrigerated warehouse space, electric plug-in units shall be installed at every dock door servicing the refrigerated space to allow transport refrigeration units (TRUs) to plug in. Truck operators with TRUs shall be required to utilize electric plug-in units when at loading docks.

0-8.48 Cont.

(7) Bicycle racks are required per Section 30-714 and in the amount required for warehouse uses by Table 30-714 of the Zoning and Development Code. The racks shall include locks as well as electric plugs to charge electric bikes. The racks shall be located as close as possible to employee entrance(s). Nothing in this section shall preclude the warehouse operator from satisfying this requirement by utilizing bicycle parking amenities considered to be superior such as locating bicycle parking facilities indoors or providing bicycle lockers.

Sec. 9-74. – Operation and Construction.

(1) Cool surface treatments shall be added to all drive aisles and parking areas or such areas shall be constructed with a solar-reflective cool pavement such as concrete.

(2) To ensure that warehouse electrical rooms are sufficiently sized to accommodate the potential need for additional electrical panels, either a secondary electrical room shall be provided in the building, or the primary electrical room shall be sized 25% larger than is required to satisfy the service requirements of the building or the electrical gear shall be installed with the initial construction with 25% excess demand capacity.

(3) Use of super-compliant VOC architectural and industrial maintenance coatings (e.g., paints) shall be required.

(4) The facility operator shall incorporate a recycling program.

(5) The following environmentally responsible practices shall be required during construction:

a. The applicant shall use reasonable best efforts to deploy the highest rated CARB Tier technology that is available at the time of construction. Prior to permit issuance, the construction contractor shall submit an equipment list confirming equipment used is compliant with the highest CARB Tier at the time of construction. Equipment proposed for use that does not meet the highest CARB Tier in effect at the time of construction, shall only be approved for use at the discretion of the Planning Director and shall require proof from the construction contractor that, despite reasonable best efforts to obtain the highest CARB Tier equipment, such equipment was unavailable.

O-8.48 Cont.

b. Use of electric-powered hand tools, forklifts, and pressure washers.

c. Designation of an area in any construction site where electric-powered construction vehicles and equipment can charge.

d. Identification in site plans of a location for future electric truck charging stations and installation of a conduit to that location.

e. Diesel-powered generators shall be prohibited except in case of emergency or to establish temporary power during construction.

(6) A Property Maintenance Program shall be submitted for review and approval by the Planning Director or his/her designee prior to the issuance of building permits. The program shall provide for the regular maintenance of building structures, landscaping, and paved surfaces in good physically condition, and appearance. The methods and maximum intervals for maintenance of each component shall be specified in the program.

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(7) Property owner shall provide facility operator with information on incentive programs such as the Carl Moyer Program and Voucher Incentive Program and shall require all facility operators to enroll in the United States Environmental Protection Agency's SmartWay Program.

Section 3. Based on the foregoing, the City Council determines that the project is categorically exempt from further review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061(B)(3) (the common-sense exemption) and, alternatively, pursuant to CEQA Guidelines Section 15307 (Actions by Regulatory Agencies for Protection of Natural Resources) and 15308 (Actions by Regulatory Agencies for Protection of the Environment), and Section No. 3.22 of the 2019 Local Guidelines for Implementing CEQA, as implementation of this Ordinance is to improve the environment. The Council hereby directs staff to prepare, execute and file with the San Bernardino County Clerk a notice of exemption within five working days after the adoption of this Ordinance.

Section 4. If any section, sentence, clause or phrase of this Ordinance or the application thereof to any entity, person or circumstance is held for any reason to be invalid or unconstitutional, such invalidity or unconstitutionality shall not affect other provisions or applications of this Ordinance which can be given effect without the invalid provision or application, and to this end the provisions of this Ordinance are severable. The people of the City of Fontana hereby declare that they would have adopted this Ordinance and each section, sentence, clause or phrase thereof, irrespective of the fact that any one or more section, subsections, sentences, clauses or phrases be declared invalid or unconstitutional.

O-8.48 Cont.

Section 5. This Ordinance shall take effect thirty (30) days after the date of its adoption.

Section 6. The City Clerk shall certify to the adoption of this Ordinance. Not later than fifteen (15) days following the passage of this Ordinance, the Ordinance, or a summary thereof, along with the names of the City Council members voting for and against the Ordinance, shall be published in a newspaper of general circulation in the City of Fontana. The City Clerk is the custodian of records for this Ordinance and the records are available at 8353 Sierra Avenue, Fontana CA 92335.

APPROVED AND ADOPTED 12th day of April, 2022.

READ AND APPROVED AS TO LEGAL FORM:

DocuSigned by:
Ruben Duran
622D5F9CCD6240C...
City Attorney

I, Germaine McClellan Key, City Clerk of the City of Fontana, and Ex-Officio Clerk of the City Council, do hereby certify that the foregoing Ordinance is the actual Ordinance

adopted by the City Council and was introduced at a regular meeting on the 22nd day of March, 2022, and was finally passed and adopted not less than five days thereafter on the 12th day of April, 2022, by the following vote to wit:

AYES: Mayor Warren, Mayor Pro Tem Garcia, Council Members, Cothran, Roberts and Sandoval
NOES: None
ABSENT: None
ABSTAIN: None

DocuSigned by:
Germaine McClellan Key
8FCB7DF749584D6...
City Clerk of the City of Fontana

DocuSigned by:
Requanetta Warren
9B476DABB90D46B...
Mayor of the City of Fontana

ATTEST:

DocuSigned by:
Germaine McClellan Key
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City Clerk

0-8.48
Cont.

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NOTICE OF EXEMPTION

PTO: Clerk of the Board of Supervisors
County of San Bernardino
385 N. Arrowhead Avenue, 2nd Floor
San Bernardino, CA 92415-0130

FROM: City of Fontana
Planning Department
8353 Sierra Avenue
Fontana, CA 92335

1. Project Title: **Municipal Code Amendment (MCA) No. 21-001R1 for an Amendment to Chapter 9 of the Municipal Code to Modify Article V to Revise Sustainability Standards for Industrial Commercial Centers throughout the City.**

2. Project Location - Specific: **Citywide**

3. (a) Project Location - City: **Fontana**
   (b) Project Location - County: **San Bernardino**

4. Description of nature, purpose, and beneficiaries of Project: **The proposed Municipal Code Amendment (MCA) No. 21-001R1 is for the amendment of Chapter 9 of the Municipal Code to modify Article V to revise industrial commerce centers sustainability standards. That includes modifications and clarification to buffering and screening requirements, clarification on building orientation, requirements for alternative energy, and improvements to construction as it relates to industrial commercial centers throughout the city.**

5. Name of Public Agency approving project: **City of Fontana**

6. Name of Person or Agency carrying out project: **City of Fontana**

7. Exempt status: (Check one)
   (a) _____ Ministerial project.
   (b) _____ Not a project.
   (c) _____ Emergency Project.
   (d) __X__ Categorical Exemption. State type and class number Sections 15307 (Actions by Regulatory Agencies for Protection of Natural Resources) and 15308 (Actions by Regulatory Agencies for Protection of the Environment) and Section No. 3.22 of the Local 2019 Guidelines for Implementing the CEQA.
   (e) _____ Declared Emergency.
   (f) _____ Statutory Exemption. State Code section number: _____
   (g) __X__ Other. Explanation: 15061(B)(3) (the common-sense exemption)

Reason why project was exempt: The Ordinance includes additional more restrictive standards and clarification of existing standards for industrial commerce centers to improve environmental quality and does not include the construction of any structures. All new projects involving construction of industrial commerce centers will continue to be subject to an Administrative Site Plan/Design Review, where a project-specific analysis based on location and project details will be conducted, subject to CEQA review/documentation. Therefore, all industrial commerce center projects will be subject to CEQA, standard Conditions of Approval, and all other State/Federal/Local requirements.

8. Contact Person: Rina Leung, Senior Planner Telephone: (909) 350-6566

Date Received for Filing:

DiTanyon Johnson
Principal Planner

(Clerk Stamp Here)

ATTACHMENT NO. 2

0-8.48 Cont.

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FONTANA
CALIFORNIA

NOTICE OF PUBLIC HEARING

SI DESEA INFORMACION EN ESPAÑOL REFERENTE A ESTA NOTIFICACION O PROYECTO, FAVOR DE COMUNICARSE AL (909) 350-6728.

In compliance with Section 202 of the Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132) and the federal rules and regulations adopted in implementation thereof, the Agenda will be made available in appropriate alternative formats to persons with a disability. Should you need special assistance to participate in this meeting, please contact the City Clerk's Department by calling (909) 350-7602 or email at clerks@fontana.org. Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting.

A PUBLIC HEARING HAS BEEN SCHEDULED BEFORE THE CITY COUNCIL OF THE CITY OF FONTANA FOR THE FOLLOWING:

Municipal Code Amendment (MCA) No. 21-001R1 for an Amendment to Chapter 9 of the Municipal Code to Modify Article V to Revise Sustainability Standards for Industrial Commerce Centers throughout the City

0-8.48 Cont.

Municipal Code Amendment (MCA) No. 21-001R1 to amend Chapter 9 of the Municipal Code to modify Article V revise sustainability standards that includes modifications and clarification to buffering and screening requirements, methods to improve traffic circulation, requirements for alternative energy, and improvements to construction as it relates to industrial commerce centers throughout the city.

Environmental Determination:	This project qualifies for a categorical exemption pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15061(B)(3) (the common-sense exemption) and, alternatively, pursuant to CEQA Guidelines Section 15307 (Actions by Regulatory Agencies for Protection of Natural Resources) and 15308 (Actions by Regulatory Agencies for Protection of the Environment), and Section No. 3.22 of the 2019 Local Guidelines for Implementing CEQA, as implementation of this Ordinance is to improve the environment.
Location of Property:	Citywide
Date of Hearing:	March 22, 2022
Place of Hearing:	City Hall Council Chambers 8353 Sierra Avenue Fontana, CA 92335

DocuSign Envelope ID: 440205DF-A281-45CB-BF15-211C45B14006

FONTANA
CALIFORNIA

Time of Hearing: 7:00 pm

O-8.48 Cont.

Should you have any questions concerning this project, please contact, **Rina Leung**, at (909) 350-6566 or rleung@fontana.org

ANY INTERESTED PARTY MAY PROVIDE INFORMATION BY LETTER OR EMAIL WHICH MAY BE OF ASSISTANCE TO THE CITY COUNCIL. A COPY OF THE ENVIRONMENTAL DOCUMENTATION IS AVAILABLE FOR INSPECTION. PLEASE CONTACT THE PLANNER LISTED ABOVE.

IF YOU CHALLENGE IN COURT ANY ACTION TAKEN CONCERNING A PUBLIC HEARING ITEM, YOU MAY BE LIMITED TO RAISING ONLY THOSE ISSUES YOU OR SOMEONE ELSE RAISED AT THE PUBLIC HEARING DESCRIBED IN THIS NOTICE, OR IN WRITTEN CORRESPONDENCE TO THE CITY AT, OR PRIOR TO, THE PUBLIC HEARING.

Publish:
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8353 Sierra Avenue
Fontana, CA 92335

City of Fontana

Action Report

City Council Meeting

File #: 21-1256
Agenda #: B.

Agenda Date: 3/22/2022
Category: Public Hearing

FROM:
Planning Department

SUBJECT:
Municipal Code Amendment (MCA) No. 21-001R1 for an Amendment to Chapter 9 of the Municipal Code to Modify Article V to Revise Sustainability Standards for Industrial Commerce Centers throughout the City

RECOMMENDATION:
Read by title only and waive further reading of and introduce **Ordinance No.___**, an Ordinance of the City Council of the City of Fontana, approving Municipal Code Amendment (MCA) No. 21-001R1 for an amendment to Chapter 9 of the Municipal Code to modify Article V to revise sustainability standards for industrial commerce centers throughout the city, and the reading of the title constitutes the first thereof.

0-8.48 Cont.

COUNCIL GOALS:

- To promote economic development by pursuing business retention, expansion and attraction.
- To promote economic development by establishing a quick, consistent development process.

DISCUSSION:
The City of Fontana currently regulates industrial commerce centers in Specific Plans, Chapter 30 of the Zoning and Development Code, and in Chapter 9, and Article V (Industrial Commerce Centers Sustainability Standards) of the Municipal Code. Ordinance No. 1879 that established Article V in Chapter 9 of the Municipal Code was adopted by City Council on February 8, 2022.

The proposed Municipal Code Amendment (MCA) No. 21-001R1 is for the amendment of Chapter 9 of the Municipal Code to modify Article V to revise industrial commerce centers sustainability standards. That includes modifications and clarification to buffering and screening requirements, methods to improve traffic circulation, requirements for alternative energy, and improvements to construction as it relates to industrial commerce centers throughout the city.

The following is a brief summary of the revised standards that shall apply to all industrial commerce centers in the City of Fontana (a detailed comprehensive list of all the requirements is located in the Ordinance, Attachment No. 1):

1. Additional requirements for larger buildings over 400,000 square feet:
    a. A 20-foot wide landscaping buffer adjacent to sensitive receptors;
    b. A minimum of 300 feet separation of the building's loading dock from a sensitive receptor; and
    c. A requirement to include a truck operator lounge.

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2. An additional requirement for parking lot trees to provide at least 35% shade cover of parking areas within fifteen years.

3. Clarification on orientation of loading docks and truck entries.

4. Additional alternative energy improvements to require the office portion that is not covered with solar panels or utilities to include light colored roofing with a solar reflective index of not less than 78.

5. Revision of VOC paints to be super-compliant instead of low.

6. Clarification of documentation requirements in utilizing the available highest rated CARB Tier technology during construction.

ENVIRONMENTAL FINDING:
This project is exempt per the California Environmental Quality Act (CEQA) pursuant to Guidelines Section 15061(B)(3) (the common-sense exemption) and, alternatively, pursuant to CEQA Guidelines Section 15307 (Actions by Regulatory Agencies for Protection of Natural Resources) and 15308 (Actions by Regulatory Agencies for Protection of the Environment), and Section No. 3.22 of the 2019 Local Guidelines for Implementing CEQA, as implementation of this Ordinance is to reduce potential impacts to air and environmental quality.

0-8.48 Cont.

FISCAL IMPACT:
None

MOTION:
Approve staff's recommendation

ATTACHMENTS:

1. City Council Ordinance
2. Notice of Exemption
3. Public Hearing Notice

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Certificate Of Completion

Envelope Id: 440205DFA28145CBBF15211C45B14006
Subject: URGENT Please DocuSign: Ordinance 1891
Source Envelope:
Document Pages: 14
Certificate Pages: 5
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Initials: 0

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Signer Events	Signature	Timestamp
Ruben Duran ruben.duran@bbklaw.com Security Level: Email, Account Authentication (None)	DocuSigned by: Ruben Duran 622D5F9CCD6240C... Signature Adoption: Pre-selected Style Signed by link sent to ruben.duran@bbklaw.com Using IP Address: 174.195.132.203 Signed using mobile	Sent: 4/13/2022 | 12:23 PM Resent: 4/13/2022 | 04:07 PM Viewed: 4/13/2022 | 04:15 PM Signed: 4/13/2022 | 04:16 PM
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Germaine McClellan Key gkey@fontana.org Security Level: Email, Account Authentication (None)	DocuSigned by: Germaine McClellan key 8FCB7DF749584D6... Signature Adoption: Pre-selected Style Signed by link sent to gkey@fontana.org Using IP Address: 107.201.246.59	Sent: 4/13/2022 | 04:51 PM Viewed: 4/13/2022 | 04:58 PM Signed: 4/13/2022 | 04:59 PM
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In Person Signer Events	Signature	Timestamp

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Certified Delivery Events	Status	Timestamp

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Evelyne Ssenkoloto essenkol@fontana.org Security Level: Email, Account Authentication (None) **Electronic Record and Signature Disclosure:** Accepted: 10/13/2021 | 04:17 PM ID: e7145250-7347-428b-af51-3066469cc29f	COPIED	Sent: 4/13/2022 | 04:59 PM
Kathy Kasinger kkasinger@fontana.org Records Coordinator Security Level: Email, Account Authentication (None) **Electronic Record and Signature Disclosure:** Accepted: 4/12/2022 | 07:28 AM ID: 6bf6d243-6517-4841-a35f-dcf0ba649302	COPIED	Sent: 4/13/2022 | 04:59 PM
Susana Gallardo sgallardo@fontana.org Security Level: Email, Account Authentication (None) **Electronic Record and Signature Disclosure:** Not Offered via DocuSign	COPIED	Sent: 4/13/2022 | 04:59 PM
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Witness Events	Signature	Timestamp

Notary Events	Signature	Timestamp

Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	4/13/2022 | 12:23 PM
Certified Delivered	Security Checked	4/13/2022 | 04:58 PM
Signing Complete	Security Checked	4/13/2022 | 04:59 PM
Completed	Security Checked	4/13/2022 | 04:59 PM

Payment Events	Status	Timestamps

Electronic Record and Signature Disclosure

0-8.48
Cont.

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If you decide to receive notices and disclosures from us electronically, you may at any time change your mind and tell us that thereafter you want to receive required notices and disclosures only in paper format. How you must inform us of your decision to receive future notices and disclosure in paper format and withdraw your consent to receive notices and disclosures electronically is described below.

0-8.48 Cont.

Consequences of changing your mind

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All notices and disclosures will be sent to you electronically

Unless you tell us otherwise in accordance with the procedures described herein, we will provide electronically to you through your DocuSign user account all required notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you during the course of our relationship with you. To reduce the chance of you inadvertently not receiving any notice or disclosure, we prefer to provide all of the required notices and disclosures to you by the same method and to the same address that you have given us. Thus, you can receive all the disclosures and notices electronically or in paper format through the paper mail delivery system. If you do not agree with this process, please let us know as described below. Please also see the paragraph immediately above that describes the consequences of your electing not to receive delivery of the notices and disclosures electronically from us.

How to contact City of Fontana:
You may contact us to let us know of your changes as to how we may contact you electronically, to request paper copies of certain information from us, and to withdraw your prior consent to receive notices and disclosures electronically as follows:
To contact us by email send messages to: ctejeda@fontana.org

To advise City of Fontana of your new e-mail address
To let us know of a change in your e-mail address where we should send notices and disclosures electronically to you, you must send an email message to us at ctejeda@fontana.org and in the body of such request you must state: your previous e-mail address, your new e-mail address. We do not require any other information from you to change your email address..
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0-8.48 Cont.

Required hardware and software

Operating Systems:	Windows2000? or WindowsXP?
Browsers (for SENDERS):	Internet Explorer 6.0? or above
Browsers (for SIGNERS):	Internet Explorer 6.0?, Mozilla FireFox 1.0, NetScape 7.2 (or above)
Email:	Access to a valid email account
Screen Resolution:	800 x 600 minimum
Enabled Security Settings:	•Allow per session cookies •Users accessing the internet behind a Proxy Server must enable HTTP 1.1 settings via proxy connection

** These minimum requirements are subject to change. If these requirements change, we will provide you with an email message at the email address we have on file for you at that time providing you with the revised hardware and software requirements, at which time you will have the right to withdraw your consent.

Acknowledging your access and consent to receive materials electronically

To confirm to us that you can access this information electronically, which will be similar to other electronic notices and disclosures that we will provide to you, please verify that you were able to read this electronic disclosure and that you also were able to print on paper or electronically save this page for your future reference and access or that you were able to e-mail this disclosure and consent to an address where you will be able to print on paper or save it for your future reference and access. Further, if you consent to receiving notices and disclosures exclusively in electronic format on the terms and conditions described above, please let us know by clicking the 'I agree' button below.

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O-8.48 Cont.

Letter O-8

Shute, Mihaly, and Weinberg (R-NOW)
March 10, 2023

O-8.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

O-8.2 This comment is introductory in nature. Specific comments regarding the Draft EIR, including the air quality letter report attached to the comment letter, are provided and responded to below.

O-8.3 This comment discusses the historical formation of March JPA, the current land use designations of the Project site, and redevelopment of the former base area. The comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein

O-8.4 This comment discusses the formation of the Riverside Neighbors Opposing Warehouses (R-NOW) and its opposition to the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. The comment further discusses the amendment and partial assignment of the West March Development and Disposition Agreement. Contrary to the comment's interpretation, the 2nd Amendment to the West March Development and Disposition Agreement does not incentive certain types of development. In response, please see Topical Response 10 - West March Development and Disposition Agreement. The comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein.

O-8.5 This comment refers to existing warehouse development and articles that discuss warehouse development in the Inland Empire. Specific comments regarding the Draft EIR, including the referenced Appendix B attached to the comment letter, are provided and responded to below. This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein.

O-8.6 This comment references the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages and overstates the amount of development. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment states the Project "allocates more than a thousand auto parking spaces and truck/trailer parking spaces" across the Specific Plan Area, but the cited Draft EIR pages do not address parking. The plot plans for Buildings B and C (Figures 3-9 and 3-10) include proposed parking. Table 3-3 of the proposed Specific Plan sets forth the minimum passenger vehicle parking space requirements applicable to the Specific Plan Area.

O-8.7 This comment refers generally to potential impacts related to climate change and human health associated with warehouse development and states the commenter's opinion that the Draft EIR fails to adequately analyze or effectively mitigate the Project's significant impacts or to consider an adequate range of alternatives, including one without warehouse use. The Draft EIR presents a comprehensive assessment of the Project's potential significant environmental impacts, identifies project design features and feasible mitigation measures that avoid and reduce the Project's adverse

environmental impacts, addresses a reasonable range of alternatives to the proposed Project, and, on an overall basis, informs the governmental decision-makers and the public regarding the Project's potential short-term and long-term significant environmental impacts. In these ways, the Draft EIR achieves the basic objectives for CEQA review, as set forth in CEQA Guidelines Sections 15121(a) and 15362. Regarding alternatives, please see Topical Response 8 – Alternatives, which includes analysis of a non-industrial alternative. Specific comments regarding the Draft EIR are provided and responded to below.

O-8.8 This comment alleges that the Draft EIR's discussion of existing conditions omits information regarding existing warehouse facilities in the area. CEQA and CEQA caselaw require a complete explanation of the environmental setting. The Draft EIR provides this information for each issue area, see Section 4.0, Environmental Analysis, of the Draft EIR for the discussion of analysis format. As explained in the Draft EIR, each EIR section includes an existing setting discussion that describes the physical environmental conditions within the Project area as they existed at the time the NOP was prepared in November 2021; these conditions are considered the baseline physical conditions from which March JPA determines whether an impact is considered to be significant (CEQA Guidelines Section 15125(a)). The comment refers to a map of existing warehouses in the area included as Appendix C to the comment letter. Appendix C referenced in the comment is an aerial photograph with parcels outlined in blue, green, red, and orange that appears to depict warehouse buildings at various locations described in the comment as City of Riverside Sycamore Canyon; March JPA North Campus – Meridian; March JPA South Campus – Van Buren; Moreno Valley – Alessandro Boulevard and Cactus Avenue; and Perris, Moreno Valley – Heacock and Mead Valley. These developments are already existing and therefore are included in the Project's baseline conditions as appropriate for each impact area analyzed in the Draft EIR.

The Draft EIR describes and discloses the environmental setting which includes existing facilities (as well as others) that currently generate truck trips, air emissions, and noise. The fact that these are existing facilities means that the ambient environmental conditions, including existing air quality, existing traffic and truck traffic, and existing noise, take into account these uses and projects in the analysis. For example, as explained in Section 4.11, Noise, 24-hour noise level measurements were taken at eight locations within the Project study area to assess the existing noise level environment. As such, the Draft EIR and the analysis therein did take these existing conditions into account when evaluating the potential additional impacts that would result from implementation of the Project. As explained in Chapter 4, Environmental Analysis, existing conditions are addressed in connection with each environmental issue area analyzed in the Draft EIR. As referenced in the comment, the local attainment status of criteria air pollutants is discussed in Recirculated Section 4.2, Air Quality.

O-8.9 The comment states that the analysis fails to disclose that the area is in nonattainment for NO_2. Although the Project site is not located in this area of nonattainment and is in attainment for NO_2, Table 4.2-2, South Coast Air Basin Attainment Classifications, of Recirculated Section 4.2, Air Quality was updated to identify that SR-60 between San Bernardino and Riverside Counties is a nonattainment area for NO_2. This comment states that in order for decision-makers and the public to be able to fully understand the environmental impacts of the Project, detailed descriptions of five things must be included. Consistent with the comment's suggestion, each of these items is addressed in the Draft EIR, as explained in greater detail below.

- Existing transportation infrastructure around the Project site, including the existing accident rates on roadways and availability of public transportation.

Section 4.15, Transportation, of the Draft EIR discusses existing transportation infrastructure around the Project site, including a summary of the existing circulation network, the March JPA General Plan Circulation Network, adjacent jurisdictions' General Plan Circulation Elements, bicycle and pedestrian facilities, truck routes and transit service. The Draft EIR adequately describes the existing transportation infrastructure around the Project site, including the availability of public transportation. The inclusion of existing accident rates on roadways is not an environmental topic or threshold evaluated under CEQA, and as such, the EIR need not include accident rate information. However, consistent with the CEQA Guidelines, the Draft EIR analyzes whether or not implementation of the Project would have the potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. As discussed in Section 4.15, Transportation, with the inclusion of PDF-TRA-1, which requires on-site and site-adjacent roadway improvements in the Project vicinity, as well as implementation MM-TRA-1 (Construction Traffic Management Plan) and MM-TRA-2 (Barton Street Traffic Safety Plan), the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

- The existing hydrological and hydraulic conditions of drainages in the vicinity of the Project.
- Section 4.9, Hydrology and Water Quality, of the Draft EIR includes a detailed discussion of the existing regional watershed topography, storm drainage, hydrologic conditions of concern, surface water quality, State and Federal requirements, County of Riverside and March JPA requirements, water supply, ground water, and flood hazards.
- Properly documented noise levels existing at and around the Project site.
- As discussed in Section 4.11, Noise, noise measurements were properly taken at and surrounding the Project site, characterizing the existing noise environment in detail.
- Cumulative projects, including major construction projects, that will be carried out in the area during the period when the Project will be under construction.

With regard to cumulative projects, the cumulative effects analysis methodology is discussed in detail in Topical Response 7 – Cumulative Projects and Chapter 4, Environmental Analysis, and includes a list and description of all related projects, as well as a map showing where the projects are located (see Table 4-2, Cumulative Projects, and Figure 4-1, Cumulative Development Location Map). As explained in the Draft EIR, the list of projects is based on the information provided in the Project Traffic Analysis (Appendix N-2). The cumulative project list was developed for the purposes of the EIR analysis through consultation with planning and engineering staff from March JPA, County of Riverside, and the cities of Riverside and Moreno Valley to include key projects in these jurisdictions.

- Any other relevant regional and local setting information (the comment identifies number and type of warehouse facilities and proximity to the site as an example) necessary to evaluate project and cumulative impacts.

With regard to regional and local setting information, each environmental topic section of the Draft EIR includes a subsection documenting the environmental setting and existing conditions. Inclusion of the environmental setting and existing conditions allows readers to understand how implementation of the proposed Project could alter the existing, or baseline, conditions.

As such, given that the existing conditions and environmental setting are described in Recirculated Chapter 3, Project Description, as well as for each environmental topic included throughout Chapter 4, of the EIR, the EIR provides sufficient information for decision makers and the public. The comment does not specifically identify any inadequacies. Specific comments regarding the Draft EIR are provided and responded to below.

0-8.10 This comment discusses the importance of a project description for CEQA purposes and claims that the Project description in the EIR is incomplete. The comment cites *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (27 Cal.App.4th 713) regarding the importance of a comprehensive project description for purposes of CEQA analysis. Unlike the EIR at issue in *San Joaquin Raptor*, which failed to address whether wetlands were located on the site and a nearby wetland wildlife preserve, and also omitted discussion of a necessary sewer expansion component of the project, the Project site is properly and fully described, and all associated infrastructure is included, in the EIR. Consistent with the requirements described in *San Joaquin Raptor*, the Draft EIR adequately apprises all interested parties of the true scope of the Project for intelligent weighing of the environmental consequences of the Project and satisfies the purpose of an EIR, which is to provide enough information about a project so that the decision-makers can make an informed decision. (*San Joaquin Raptor*, 27 Cal.App.4th at 734, 718.) Similarly, the other case cited by the comment, *County of Inyo v. City of Los Angeles* (71 Cal.App.3d 185), emphasizes the importance of an accurate, stable and finite project description – a defined project that is the subject of the EIR, in contrast to the EIR at issue in that case, which the court found that what was proposed as the project expanded and contracted from place to place within the EIR. (*County of Inyo*, 71 Cal.App.3d at 199, 190.) Here, as required by CEQA and consistent with the caselaw, the proposed Project is clearly defined and consistently described and studied in the EIR.

The comment suggests that a revised EIR should include building design and specifications, construction details including an erosion control plan and a drainage plan, details of planned landscaping and lighting, and information about the location and number of public trails. Contrary to the comment's suggestion, the EIR includes details about construction in the assessment of construction impacts throughout the document; Section 4.6, Geology and Soils discusses erosion control and Section 4.1, Aesthetics, addresses landscaping and lighting as does the proposed Specific Plan's Development Regulations that set forth the requirements for landscaping and lighting. As such, the Draft EIR includes the information needed for evaluation and review of the Project's potential environmental effects, consistent with the requirements of CEQA. As required by CEQA, a detailed description of the Project is provided in Recirculated Chapter 3, Project Description. As explained therein, the proposed Project consists of two components for analysis purposes in the EIR: the Specific Plan Area and the Conservation Easement. The proposed Specific Plan would regulate future development within the Project site, and the EIR analyzed a full buildout scenario of the Specific Plan Area. The EIR evaluates implementation of the Specific Plan at a project level while development specifics for certain parcels, specifically Building B and Building C, are more certain at this time. The remainder of the proposed Project is evaluated with an assumed buildout scenario to represent a conservative maximum buildout to fully characterize environmental impacts associated with Specific Plan implementation. The proposed Specific Plan sets forth the criteria for what the buildings will look like when each building is designed and approved, including design specifications, erosion, drainage, landscaping, and lighting. Simultaneous with the release of the Draft EIR for public review, the proposed West Campus Upper Platea Specific Plan was also (and still is) available for public review in the following location online: https://marchjpa.com/mjpa-meridian-west-campus/. With regard to public

trails, trails with cardio stops would be included within the new Park developed as part of the Project as explained in Recirculated Chapter 3, Project Description, and depicted on Figure 2-4, Conceptual 60-Acre Park Design, of the proposed Specific Plan. The Project does not include additional trails within the Conservation Easement.

O-8.11 This comment questions the contents of the proposed Development Agreement. As indicated in Section 3.5.6, Requested Approvals and Entitlements, in Recirculated Chapter 3, Project Description, a Development Agreement is one of the approvals that will be considered by March JPA as part of the proposed Project. A Development Agreement provides assurances to both the local agency and the property owner regarding the regulations applicable to the property and the specified public benefits to be provided by the property owner. Development agreements are authorized per the Government Code, which contemplates that parties to a development agreement may have successors in interest. Further, as provided by the Government Code, a development agreement is a legislative act that must be approved by ordinance. March JPA will make the Development Agreement available at a public hearing prior to adoption. As outlined in the Recirculated Chapter 3, Project Description, the Community Benefits provided in the proposed Development Agreement include funding and construction of the proposed Park and construction of the Meridian Fire Station. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete. The construction of the proposed Park is evaluated throughout the Draft EIR. The construction of the Meridian Fire Station was previously evaluated under CEQA. Please see Topical Response 6 - Meridian Fire Station, for additional details. The sunset provision of March JPA does not impede its authority to enter into the Development Agreement, which is discussed further in Topical Response 9 - Long Term Project Implementation and Enforcement.

O-8.12 This comment alleges the Draft EIR defers plans and specifications related to building design. To the contrary, the EIR includes the information needed for evaluation and review of the Project's potential environmental effects, consistent with the requirements of CEQA, and each example the comment cites is addressed below. A detailed description of the Project is provided in Recirculated Chapter 3, Project Description, and, as required by CEQA, the EIR examines all phases of the Project, including planning, construction, and operation. (See Section 15161 of the CEQA Guidelines). As explained in Recirculated Chapter 3, Project Description, the proposed Specific Plan would regulate future development within the Project site, and the Draft EIR analyzes a full buildout scenario of the Specific Plan Area. As such, as explained in the EIR, the EIR evaluates implementation of the Specific Plan at a project level while development specifics for Building B and Building C are more certain at this time.

The comment refers to "plans and specifications for features that are relied upon to reduce air emissions" on page 1-20 of the Draft EIR. The comment appears to be referencing MM-AQ-7, which requires plans and specifications to be submitted to March JPA prior to building permit issuance to demonstrate that each project building is designed for passive heating and cooling and designed to include natural light, and MM-AQ-13, which requires plans and specifications to be submitted to March JPA prior to building permit issuance to demonstrate that electrical service is provided to each of the areas in the vicinity of

the building that are to be landscaped in order that electrical equipment may be used for landscape maintenance. As is typical, detailed plans and specifications would be prepared for each specific building within the Project prior to development, and the mitigation measures would ensure that each specific building includes the required features specified in the measures (passive heating and cooling, natural light, and electrical service to landscaped areas for the use of electrical equipment for landscape maintenance). The Draft EIR includes the information needed for evaluation and review of the Project's potential air quality impacts and identifies mitigation measures. The required Project mitigation measures, including the mitigation measures added to the Project in Recirculated Section 4.2, Air Quality, will be included in the Mitigation Monitoring and Reporting Program, which will provide for monitoring, implementation, and enforcement of all mitigation measures.

The comment suggests that the Draft EIR also defers preparation of a Soil Stabilization Plan and does not include a commitment to implement any of the potential soil stabilizing measures. The comment appears to refer to MM-HYD-1, which requires the preparation of an Interim Soil Stabilization Plan. This plan would be required to be prepared prior to issuance of a grading permit and approved by March JPA. MM-HYD-1 provides examples of soil stabilization measures and requires the plan to include detailed measures that will be taken to prevent soil erosion, to the satisfaction of March JPA. As allowed under CEQA Guidelines Section 15126.4(a)(1)(B), the specific details of a mitigation measure may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure. The Draft EIR includes the information needed for evaluation and review of the Project's potential impacts, and the required Project mitigation measures will be included in the Mitigation Monitoring and Reporting Program, which will provide for monitoring, implementation, and enforcement of all mitigation measures. Similarly, the comment refers to preparation of a Construction Traffic Management Plan, which is required by mitigation measure MM-TRA-1 prior to the issuance of building permits. MM-TRA-1 specifies measures that must be included in the plan, which would be reviewed and approved by March JPA. MM-TRA-1 has been revised to require the preparation of the Construction Traffic Management Plan prior to the issuance of grading permits. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR. The comment states that the Construction Traffic Management Plan fails to include the Barton Street Traffic Safety Plan. The Barton Street Traffic Safety Plan is required by MM-TRA-2, prior to the issuance of grading permits. The Draft EIR includes the information needed for evaluation and review of the Project's potential impacts, and the required Project mitigation measures will be included in the Mitigation Monitoring and Reporting Program, which will provide for monitoring, implementation, and enforcement of all mitigation measures.

The comment also states that the Draft EIR fails to include a Hydrology/Drainage Report or a Water Quality Management Plan and refers to pages 1-62 to 1-64 of the Draft EIR. These pages of the Draft EIR include MM-HYD-2, which requires a Water Quality Management Plan to be prepared to the satisfaction of March JPA prior to the issuance of each building permit, and MM-HYD-3, which requires a Hydrology/Drainage Report to be prepared to the satisfaction of March JPA prior to issuance of each building permit. As is typical, detailed plans and specifications would be prepared for each specific building within the Project prior to development, and the mitigation measures would ensure that each specific building includes the required features specified in the measures. As set forth in MM-HYD-2,

the Water Quality Management Plan required by the mitigation measure would be consistent with the Master Project Specific Water Quality Management Plan, Master Meridian West Campus Upper Plateau, which is provided as Appendix K-2 of the EIR, and must meet the requirements of the Riverside County Municipal Separate Storm Sewer System (MS4) Permit, as well as the National Pollutant Discharge Elimination System (NPDES) New Development & Redevelopment Guidelines for Projects Under the March Joint Powers Authority, also known as the March JPA WQMP Guidance Document. Project-specific Water Quality Management Plans for Buildings B and C are provided in Appendices K-3 and K-4, respectively, of the Draft EIR. Pursuant to MM-HYD-3, the required Hydrology/Drainage Study would be consistent with the Preliminary Hydrology Study for Meridian Park Upper Plateau, provided as Appendix K-1 in the Draft EIR, and comply with the 1978 Riverside County Flood Control and Water Conservation District Hydrology Manual for storm drain planning and design calculations. Project-specific Preliminary Hydrology Studies for Buildings B and C are provided in Appendices K-5 and K-6, respectively, of the Draft EIR. The Draft EIR includes the information needed for evaluation and review of the Project's potential impacts and identifies mitigation measures. The required Project mitigation measures will be included in the Mitigation Monitoring and Reporting Program, which will provide for monitoring, implementation, and enforcement of all mitigation measures.

Therefore, the Draft EIR adequately describes the Project and how it will operate during both construction and operation, and the inclusion of mitigation where detailed plans will be prepared and approved by March JPA prior to the issuance of grading and building permits does not constitute deferral, consistent with CEQA Guidelines Section 15126.4(a)(1)(B).

0-8.13 This comment states that the Draft EIR does not include specified information. Each of these points are addressed in detail below.

- Information on construction phasing and schedule;

Contrary to the comment's suggestion, the Draft EIR includes information regarding Project construction phasing and schedule. As detailed in Section 3.5.3, Project Construction, in Recirculated Chapter 3, Project Description, for purposes of the technical analyses throughout this EIR, construction was assumed to begin in June 2023 through October 2027. For construction assumptions throughout the EIR, a 4.35-year construction period and a 2028 opening year is assumed. The construction schedule utilized in the analysis, shown in Table 3-3, represents a "worst-case" analysis scenario; as construction would occur after the respective dates, emission factors for construction would decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity, as shown in Table 3-3, and associated construction equipment for the Project's phases of construction, listed in Table 3-4, represent a reasonable approximation of the expected construction fleet as required under CEQA. The duration of construction activity is based on an opening year of 2028. Additionally, as set forth in Tables 3-3 and 3-4 in Recirculated Chapter 3, Project Description, and described elsewhere in the Draft EIR as well, Phase 1 construction would include all rough grading and is expected to last nine months. Phase 2 would begin after completion of Phase 1 and would include site preparation, construction of the new park, and construction of the buildings throughout the Specific Plan Area. Phase 2 would last approximately 3.5 years.

- Location of the Project construction staging areas;

As detailed in Recirculated Chapter 3, Project Description, construction staging would be entirely within the construction limits shown in Figure 3-11, Construction Limits. The Specific Plan Area is 370.30 acres, and construction staging would occur on an additional area of 8.91 acres proposed to be used for construction ingress/egress and staging for construction equipment along the roadway extensions of Barton, Brown, and Cactus (Staging Area footprint) and was also evaluated for direct impacts. See, e.g., Section 4.3, Biological Resources, Figure 4.3-4, Proposed Project Impacts. As such, the Draft EIR does identify where construction staging would occur and evaluate the impacts associated with potential construction staging. In addition, the Draft EIR explains that staging of construction equipment and construction activities would be implemented according to March JPA Development Code Section 9.08.180, which addresses storage of construction equipment and building materials (Section 4.14, Recreation, of the Draft EIR). Furthermore, mitigation measure MM-AES-1 addresses construction equipment staging and screening.

- Location of proposed blasting activities;

As discussed in Section 4.11, Noise, while not specifically proposed, rock blasting may be required during grading operations to support Project construction, if bedrock material that cannot be ripped is encountered. As discussed in Section 4.6, Geology and Soils, granite bedrock is present near the surface across the majority of the Project site. This bedrock material varies in integrity from completely disintegrated rock, which has become a dense soil-like deposit, to moderately weathered rock. As explained in the Draft EIR, the bedrock is expected to range from readily rippable (easily excavated) to non-rippable (cannot be excavated), depending on the degree of weathering. Given that exact underground soil conditions are not entirely known at this point in time and whether or not bedrock material can be ripped, the Draft EIR included a worst-case analysis that assumed blasting occurring in the outside perimeter of the Development Area to disclose what potential noise and vibration impacts would be at the closest sensitive receptors to the nearest potential blasting location(s). Thus, for purposes of analysis in the Draft EIR, and as explained in the Draft EIR, the assessment of noise and vibration from potential blasting is evaluated at residences located closest to the construction zone boundary, to account for a worst-case scenario in which blasting is determined to be necessary and must be carried out at the edge of the construction zone boundary. Impacts were determined to be less than significant. In addition, as set forth in the Draft EIR, the Project includes PDF-NOI-2, which prohibits blasting within 1,000 feet of any residence or other sensitive receptor. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

- Operating hours of warehouse facilities;

As discussed in Section 4.11, Noise, the "operational noise analysis is intended to describe noise level impacts associated with the expected typical of daytime and nighttime activities within the Specific Plan Area. To present the potential worst-case noise conditions, this analysis assumes the Specific Plan would be operational 24 hours per day, seven days per week." Therefore, the analysis within the Draft EIR assumes that Specific Plan uses, including warehouses, would be operational 24 hours per day, seven days per week. Note that actual operating hours may vary once the Project is constructed and buildings are operational; however, hours of operation would not exceed the operational hours assumed in the EIR because the EIR analyzed the worst case, most impactful, scenario.

- Location and number of public trails;

As discussed in Recirculated Chapter 3, Project Description, throughout the Draft EIR, and in detail in Section 4.14, Recreation, existing trails are located within the Conservation Easement, consistent with the terms of the CBD Settlement Agreement (Appendix S). These existing trails would remain, and the proposed Park would include new trails with cardio stops. Simultaneous with the release of the Draft EIR for public review, the proposed West Campus Upper Plateau Specific Plan was also (and still is) available for public review in the following location online: https://marchjpa.com/mjpa-meridian-west-campus/, Figure 5-4, Non-Motorized Circulation Plan, of the Specific Plan depicts the existing trail network and the Project's proposed new trailhead locations.

- Location and number of fences;

As explained in Recirculated Chapter 3, Project Description, the proposed Specific Plan would regulate future development within the Project site. The EIR evaluates implementation of the Specific Plan at a project level while development specifics for certain parcels, specifically Building B and Building C, are more certain at this time. The proposed Specific Plan includes design guidelines and standards for walls and fences and indicates that fences and walls are anticipated to be proposed in conjunction with development of the individual project sites. The final locations and details of these fences and walls will be determined when buildings are designed and oriented during implementation of the Specific Plan. The proposed Specific Plan, which is available online as noted above, includes Figure 4-1, Landscape Fence and Wall Plan, which depicts fence and wall locations and details on the proposed height and type of fences and walls. Proposed walls and fences for Buildings B and C are depicted on the Plot Plans for Buildings B and C included in Recirculated Chapter 3, Project Description, (see Figures 3-9 and 3-10).

- Landscaping plan;

As explained in Recirculated Chapter 3, Project Description, buildout of the proposed Specific Plan Area would include perimeter landscaping consisting of a minimum 30-foot-wide landscape buffer along the northern, western, and southern Specific Plan Area boundaries maintained by a Landscape Lighting and Maintenance District. The Landscape Lighting and Maintenance District would also maintain perimeter slopes and street parkways. The proposed Specific Plan, which as noted above is available online, includes Landscape Design Guidelines that establish landscape principles and standards that apply to all planning areas within the Specific Plan Area. As further explained in the Draft EIR, all landscape planting would be drought tolerant and irrigated by recycled water. Streetscape landscaping is proposed for all streets within the Specific Plan Area, presenting a combination of evergreen and deciduous trees, low shrubs, and masses of groundcovers. The plant palette for the proposed Project would include colorful shrubs and groundcovers, ornamental grasses and succulents, and evergreen and deciduous trees that are commonly used throughout Southern California and the Inland Empire region. As explained in the Draft EIR, a list of plant materials approved for use in the Specific Plan Area is provided for in Appendix C, Landscape Plant Palette, of the proposed Specific Plan.

- Lighting plan.

As discussed in Section 4.1, Aesthetics, Campus Development lighting would be subject to the outdoor lighting standards and requirements contained within the proposed Specific Plan's Design Guidelines, and development within the Specific Plan Area would be required to adhere to PDF-AES-2 through PDF-AES-16, which are set forth in the Draft EIR and specifically address lighting. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. In addition, as explained in the Draft EIR, an exterior point-by-point photometric study has not yet been prepared for the Campus Development; however, implementation of MM-AES-2 requires the Project applicant to submit a photometric study as part of the building permit application that is subject to March JPA review and approval. The study must demonstrate compliance with the March JPA Development Code, Specific Plan, and lighting PDFs as applicable, and document the location, quantity, type, and luminance of all fixtures proposed on the Project site. Additionally, included with Appendix B of the Draft EIR is a Photometric Lighting Plan, prepared by Musco Lighting, for the Park playing fields with the proposed light poles at their proposed locations. The photometric plan shows how the lighting of the playing fields within the Park, which is the land use more likely to introduce new sources of light and glare adjacent to light-sensitive receptors, would remain on the Project site such that light spillover into adjacent residential uses would not occur while adequately illuminating the playing surface.

For the reasons discussed above, the Draft EIR, as well as the proposed Specific Plan, which was (and remains) available for public review, and was released simultaneously with the Draft EIR, includes specific details related to the construction phasing and schedule; location of construction staging areas; location of potential blasting activities; assumptions for operating hours of warehouse facilities; the location and number of public trails; the location and number of fences; the landscaping plan; and lighting plans.

Contrary to the comment's suggestion, the Draft EIR includes the information needed for evaluation and review of the Project's potential environmental effects, consistent with the requirements of CEQA. A detailed description of the Project is provided in Recirculated Chapter 3, Project Description, and, as required by CEQA, the EIR examines all phases of the Project, including planning, construction, and operation. (See Section 15161 of the CEQA Guidelines). Pursuant to Section 15124 of the CEQA Guidelines, the description of the project should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.

0-8.14 This comment summarizes questions about the Draft EIR's description of the existing setting and Project description. As required by CEQA, a detailed description of the Project is provided in Recirculated Chapter 3, Project Description. Contrary to the comment's suggestion, the EIR includes the information needed for evaluation and review of the Project's potential environmental effects, consistent with the requirements of CEQA. It is not clear from the comment what "undisclosed project details" the commenter believes may be contained in the Development Agreement. The proposed Development Agreement is discussed in Section 3.5.6, Requested Approvals and Entitlements, in Recirculated Chapter 3, Project Description, which explains that a Development Agreement is proposed to vest the Project entitlements and fees, ensure financing of public improvements required by the conditions of approval, and provide certain Community Benefits including compliance with the terms of the CBD Settlement Agreement and provision of new public benefits to be provided by the property owner, including, but not limited to, expansion of employment opportunities for area residents. As identified in the Recirculated Chapter 3,

Project Description, the Community Benefits in the proposed Development Agreement include funding and construction of the proposed Park and construction of the Meridian Fire Station. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete. The construction of the proposed Park is evaluated in the Draft EIR. The construction of the Meridian Fire Station was previously evaluated under CEQA. Please see Topical Response 6 – Meridian Fire Station, for additional details. See also Response O-8.11, above.

O-8.15 The introductory language in this comment explains the existing regional air quality in the South Coast Basin. This is described in Recirculated Section 4.2, Air Quality, and in the Revised Air Quality Impact Analysis (Appendix C-1). Please see Response O-8.8 above regarding the designation of the area of route SR-60 between San Bernardino and Riverside Counties as a nonattainment area for NO_2.

The comment also notes that heavy duty trucks are a source of diesel particulate matter and toxic air contaminants (TACs) and refers to a 2012 policy paper on goods movement and health impacts. Because the Project includes warehouses that will be served by heavy duty trucks, Recirculated Section 4.2, Air Quality and Appendix C-2 evaluated the health impacts from diesel particulate matter in an operational health risk assessment.

The comment states that the Draft EIR does not identify all sources of toxic air contaminants, including diesel generators. Please see Recirculated Section 4.2, Air Quality, for discussion and analysis of emergency generators.

Specific comments regarding mitigation measures are provided and responded to below.

O-8.16 The comment states that the analysis does not identify the extent or severity of impacts prior to the implementation of mitigation measures and particularly states that the health impacts of DPM emissions are not evaluated. The comment states that the project design feature requiring all electric cargo handling equipment should be classified as a mitigation measure and that the Draft EIR's HRA analysis should not have included it. In response to this comment the Revised Project Air Quality Impact Analysis and Revised Project HRA include the referenced PDF as MM-AQ-18. Please see Recirculated Section 4.2, Air Quality, and Appendix C-2 for discussion and analysis of diesel-powered cargo equipment and implementation of MM-AQ-18.

O-8.17 This comment refers to CEQA requirements regarding mitigation measures, including the implementation of feasible mitigation measures that avoid and reduce a project's adverse environmental impacts. As set forth in CEQA and confirmed in caselaw, including the case cited in the comment, "[CEQA] allows a project to continue even if there are significant environmental effects that have not been mitigated, if 'the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.'"[11]

[11] *Sierra Club v. County of Fresno*, 6 Cal.5th 502, 524 (2018), citing Public Resources Code Section 20181(b).

As the California Supreme Court confirmed in the case cited by the comment, "[a] lead agency may adopt mitigation measures that do not reduce the project's adverse impacts to less than significant levels, so long as the agency can demonstrate in good faith that the measures will be at least partially effective at mitigating the project's impacts."[12] Consistent with the requirements of CEQA and the caselaw cited in the comment, the Draft EIR presents a comprehensive assessment of the Project's potential significant environmental impacts and identifies project design features and feasible mitigation measures that avoid and reduce the Project's adverse environmental impacts. This comment does not identify specific measures or deficiencies or how particular measures would reduce the specific impacts of this Project. In addition, Recirculated Section 4.2, Air Quality, identifies numerous additional mitigation measures to reduce air quality impacts. The Project's consistency with the air quality measures for the identified projects referenced in the comment and attached to the comment letter as Appendix D (World Logistics Center), Appendix E (Centerpoint Properties), and Appendix F (Mariposa Industrial Park) is addressed in Topical Response 2 – Air Quality.

O-8.18 This comment notes that other municipalities such as the City of Fontana have adopted ordinances that mandate the inclusion of mitigation measures for warehouse/fulfillment center projects, and the comment attaches the Fontana ordinance as Appendix G to the comment letter. The comment does not specify or detail the applicability of any particular mitigation measures. As this Project is not located in Fontana, this ordinance is inapplicable. However, additional measures were included in Recirculated Section 4.2, Air Quality and are now included in the Final EIR, and the Project's consistency with the air quality measures in the City of Fontana's Ordinance 1891 is provided in Topical Response 2 – Air Quality.

O-8.19 This comment proposes mitigation measures that the commenter believes would further reduce air quality impacts. All of the measures referenced in the comment are either already incorporated into the Project or have been incorporated through new mitigation measures as explained further in Recirculated Section 4.2, Air Quality, and in Topical Response 2 – Air Quality.

Consistency with Measures Proposed in Comment O-8.19

Proposed Mitigation	Project Consistency
Minimizing Construction Impacts	
Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.	**Consistent.** **MM-AQ-2** prohibits the operating hours of construction equipment to exceed 8 hours and requires the construction contractor or submit a biweekly log to March JPA to ensure compliance.
Requiring on-road heavy-duty haul trucks to be model year 2014 or newer if diesel-fueled.	**Consistent.** **MM-AQ-3** requires the construction contractor to use heavy-duty hauling trucks that are model year 2014 or later
Providing electrical hook ups rather than use of diesel-fueled generators, for electric construction tools and equipment.	**Consistent.** **MM-AQ-3** requires the construction contractor to designate an area where electric-powered vehicles and equipment can be charged.
Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.	**Not Applicable.** The Project would have a less than significant air quality construction impact with the implementation of **MM-AQ-1** through **MM-AQ-4**. **MM-AQ-3** prohibits grading on days with an Air Quality Index forecast greater than 150 for particulates or ozone as

[12] *Id.* at 511.

Consistency with Measures Proposed in Comment O-8.19

Proposed Mitigation	Project Consistency
	forecasted for the project area (Source Receptor Area 23).
Forbidding idling of heavy equipment for more than two minutes.	**Not Applicable.** The Project would have a less than significant air quality construction impact with the implementation of **MM-AQ-1** through **MM-AQ-4**. **MM-AQ-3** prohibits construction equipment idling longer than 3 minutes.
Keeping onsite, and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.	**Consistent.** **MM-AQ-2** requires the construction contractor to submit biweekly construction equipment hours log to the March JPA. In the event alternate equipment is required, the applicant shall provide documentation demonstrating equivalent or reduced emissions based on horsepower and hours of operation. **MM-AQ-3** requires all construction equipment to be tuned and maintained in accordance with the manufacturer's specifications, with maintenance records onsite and available to regulatory authorities upon request.
Providing information on transit and ridesharing programs and services to construction employees.	**Consistent.** **MM-AQ-3** requires the construction contractor to provide transit and ridesharing information to onsite construction workers.
Providing meal options onsite for construction employees to minimize travel during meal breaks.	**Consistent.** **MM-AQ-3** requires the construction contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service.
Minimizing Ongoing Operational Impacts	
Requiring that all facility-owned and operated fleet equipment to meet or exceed 2014 model-year emissions equivalent engine standards and requiring documentation of compliance. Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.	**Consistent.** **MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later.
Requiring all on-site, service yard equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.	**Consistent.** **MM-AQ-18** requires the use of only electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen powered equipment shall also be acceptable.
Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.	**Consistent.** **MM-AQ-20** requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by

Consistency with Measures Proposed in Comment O-8.19

Proposed Mitigation	Project Consistency
	December 31, 2030 or when feasible for the intended application, whichever date is later.
Requiring truck operators to turn off engines when not in use.	**Consistent. MM-AQ-17** requires truck drivers to shut off engines when not in use.
Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.	**Consistent. MM-AQ-17** requires legible, durable, weather-proof signs placed at truck access gates, loading docks, and truck parking areas that identify: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than three (3) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager, South Coast Air Quality Management District and the California Air Resources Board to report violations. One six square foot sign providing this information shall be located on the building between every two dock-high doors and the sign shall be posted in highly visible locations at the entrance gates, semi parking areas, and trailer parking locations.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of the facility for the life of the project.	**Not Applicable.** Recirculated Section 4.2, Air Quality and Appendix C-2 assessed the Project's health risks during construction and operation and determined the Project would result in less than significant human health or cancer risks.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.	**Not Applicable.** The Project would result in less than significant human health or cancer risks. See Recirculated Section 4.2, Air Quality and Appendix C-2.
Constructing electric truck charging stations proportional to the number of dock doors at the project.	**Consistent. PDF-GHG-1** requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. **MM-AQ-11** requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.
Constructing electric plugs for electric transport refrigeration units (TRUs) at every dock door for facilities with cold storage and prohibiting diesel power for TRUs.	**Consistent. MM-AQ-8** requires that all TRU loading docks provide electrical hookups.

Consistency with Measures Proposed in Comment O-8.19

Proposed Mitigation	Project Consistency
Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.	**Consistent. MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code.
Installing solar photovoltaic systems on the project site equal to the building's projected energy needs plus providing power to all electric vehicle charging stations.	**Consistent. MM-GHG-1** requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
Requiring all stand-by emergency generators to be powered by a non-diesel fuel.	**Consistent. MM-AQ-24** prohibits the use of diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.
Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.	**Consistent. MM-AQ-22** requires the facility operator to provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.	**Consistent.** Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, **MM-AQ-21** requires each facility to implement or join a transportation demand management program, which would include: • Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees. • Create and maintain a "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work. • Inform employees of public transit and commuting services available to them (e.g., social media, signage). • Provide on-site transit pass sales and discounted transit passes. • Guarantee a ride home.

Consistency with Measures Proposed in Comment O-8.19

Proposed Mitigation	Project Consistency
	• Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees. • Designating areas for employee pickup and drop-off. • Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.
Meeting CALGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.	**Consistent.** **MM-GHG-7** requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code.
Achieving certification of compliance with LEED green building standards.	**Consistent.** **MM-AQ-6** requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent, at a minimum.
Providing employee meal options onsite or shuttles between the facility and nearby meal destinations.	**Consistent.** Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, **MM-AQ-21** requires each facility to implement or join a transportation demand management program, which would include offering shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees.
Improving and maintaining vegetation and tree canopy for residents in and around the project area.	**Consistent.** Section 3.5.2 of the proposed Specific Plan requires a 15-foot landscaped setback, measured from the Landscaping and Lighting Maintenance District (LLMD) or the public right-of-way, will be required for all front and side yards adjacent to public streets. Section 4.5 of the proposed Specific Plan outlines the Landscape Design Guidelines, including streetscape landscaping comprised of a combination of evergreen and deciduous trees, low shrubs, and masses of groundcovers to create a visually pleasing experience for pedestrians and passing motorists.
Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.	**Consistent.** **MM-AQ-22** requires the provision of information to employees and truck drivers as appropriate: • Building energy efficiency, solid waste reduction, recycling, and water conservation. • Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting.

Consistency with Measures Proposed in Comment O-8.19

Proposed Mitigation	Project Consistency
	• Participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies. • Health effects of diesel particulates, state regulations limiting truck idling time, and the benefits of minimized idling. • The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity. • Efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. **MM-AQ-25** requires the facility operator to monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable, by maintaining records on-site demonstrating compliance and making records available for inspection by the local jurisdiction, air district, and state upon request.
Requiring that every tenant enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants to use carriers that are SmartWay carriers.	**Consistent.** **MM-AQ-10** encourages tenants to become SmartWay partners, if eligible. **MM-AQ-10** also requires all loading docks to be compatible with SmartWay trucks.
Installing signs in residential areas noting that truck and employee parking is prohibited.	**Consistent.** **MM-AQ-15** requires signs clearly identifying the approved truck routes installed along the truck routes to and from the project site and within the project site. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue.
Consulting with the local public transit agency and securing increased public transit service to the project area.	**Consistent.** **MM-GHG-11** requires an in-lieu payment to the March Joint Powers Authority for the installation of a bus shelter on Alessandro Boulevard.
Designating areas for employee pickup and drop-off.	**Consistent.** See **MM-AQ-21** discussion above.
Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.	**Consistent.** **MM-AQ-27** requires each tenant to comply with the Project MMRP. **MM-AQ-25** requires the facility operator to monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable.

O-8.20 This comment asks that a mitigation fund be considered and cites as an example the World Logistics Center project in Moreno Valley which created a fund to mitigate impacts on affected residents, schools, places of worship and other community institutions by retrofitting buildings on their properties. The

comment does not identify any specific Project impacts on residents, school, places of worship or other institutions to be mitigated by a fund nor does the comment provide substantial evidence of adverse impacts that would be reduced through a mitigation fund. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), the EIR for the World Logistics Center project referenced by the comment identified significant and unavoidable health impacts to neighboring residents. Mitigation under that EIR included installation of air filtration systems at two houses. The settlement agreement mitigation fund for the World Logistics Center project expanded the eligible residences to 126 homes.[13] Here, Recirculated Section 4.2, Air Quality, and Appendix C-2 assess the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks.

The World Logistics Center Final EIR also identified significant and unavoidable construction and operational noise impacts to neighboring residents. Noise insulation mitigation was not proposed in the Final EIR for that project. The settlement agreement mitigation fund included noise insulation for approximately 74 of the surrounding homes. Here, Section 4.11, Noise, of the Draft EIR and the Project Noise Study (Appendix M-1) analyzed the Project's construction and operational noise impacts. The impact analysis is based on quantifiable thresholds and relies on existing regulations and project design features to reduce impacts. The Project would have less than significant impacts due to

[13] See Attachment C, Exhibit 1 – Filter Overview Map, of the World Logistics Center Settlement Agreement – Appendix D to Letter O-8.

construction noise, and no mitigation is required. The Project includes PDF-NOI-1 through PDF-NOI-3, which would limit the hours of construction and blasting and drilling activities, thereby further reducing the Project's construction noise and vibration impacts.

Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and will be included in the MMRP. With regard to on-site operational noise, the Draft EIR determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant. Unlike the World Logistics Center, the Project would have less than significant noise impacts to surrounding residences.

The World Logistics Center Final EIR further identified significant and unavoidable air quality impacts due to construction equipment exhaust and fugitive dust even after the implementation of mitigation. The settlement agreement mitigation fund included exterior pressure washing for the first two rows of surrounding homes. Here, Recirculated Section 4.2, Air Quality, and the Revised Project Air Quality Impact Analysis (Appendix C-1) determined the Project would have less than significant construction air quality impacts with implementation of MM-AQ-1 through MM-AQ-4. Unlike the World Logistics Center, the Project would have less than significant construction air quality impacts, with mitigation incorporated, to surrounding residences.

O-8.21 This comment refers to previously-referenced CEQA requirements regarding mitigation measures, including the implementation of feasible mitigation measures that avoid and reduce a project's adverse environmental impacts. Please see Response O-8.17 above. The comment states that March JPA must identify effective enforceable measures to minimize community impacts, and states that attachments to the comment (Appendices D-F) contain detailed mitigation measures that should be considered and adopted if feasible. Please see Recirculated Section 4.2, Air Quality, for discussion and evaluation of expanded air quality mitigation measures and Topical Response 2 - Air Quality, regarding the Project's consistency with the air quality measures for the identified projects provided in Appendix D (World Logistics Center), Appendix E (Centerpoint Properties), and Appendix F (Mariposa Industrial Park) to the comment letter. The comment also cites to *Citizens for Quality Growth v City of Mt. Shasta* (1988) 198 Cal.App.3d 433, 443-45 for support for the comment that March JPA cannot approve the Project unless it analyzes and adopts Project alternatives or mitigation measures that meet the requisite CEQA standards. As explained in the case cited in the comment, CEQA requires a public agency to incorporate the mitigation measures or make other approved findings before approving a project with identified significant environmental impact.[14] In the case cited in the comment, the local agency "failed to make findings adopting or rejecting the proposed mitigation measures for the environmental impacts identified by the EIR. It also failed to evaluate the proposed alternatives before adopting its statement of overriding considerations…"[15] Here, Recirculated Section 4.2, Air Quality, identifies a comprehensive array of feasible measures to mitigate the Project's air quality impacts. If the Project is approved, the mitigation measures will become enforceable as conditions of approval and through the Mitigation Monitoring Reporting Program.

[14] *Citizens for Quality Growth v. City of Mt. Shasta*, 198 Cal.App.3d 433, 442 (1988).
[15] *Id.* at 446.

O-8.22 This comment suggests that the Draft EIR fails to evaluate the Project's environmental impacts in context. The comment cites Section 15064(b) of the CEQA Guidelines, which provides that the determination of whether a project may have a significant effect on the environment calls for careful judgment of the part of the public agency involved, based to the extent possible on scientific and factual data. This CEQA Guidelines section also provides that "[a]n ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area." Consistent with the requirements of CEQA, the existing conditions and environmental setting are described in Recirculated Chapter 3, Project Description. Also, as explained in Chapter 4, Environmental Analysis, existing conditions are addressed in connection with each environmental issue area analyzed in the Draft EIR. Each environmental topic section of the Draft EIR includes a subsection documenting the environmental setting and existing conditions. As such, the EIR includes the information needed for evaluation and review of the Project's potential environmental effects and provides sufficient information for decision makers and the public.

The comment notes that the Project site is located in an area identified as a disadvantaged community. The comment states that the EIR does not discuss this information or utilize it in the analysis. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8, and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

CalEPA uses CalEnviroScreen data to identify disadvantaged communities pursuant to Senate Bill 535 (SB 535, 2012) for purposes of California's Cap-and-Trade funding program as authorized by the California Global Warming Solutions Act of 2006 (AB 32), based on geographic, socioeconomic, public health, and environmental hazard criteria. SB 535 also established initial requirements for minimum funding levels to disadvantaged communities, which are specifically targeted for investment of proceeds from California's Cap-and-Trade program. https://oehha.ca.gov/calenviroscreen/sb535. As the comment notes, disadvantaged communities are defined as the top 25 percent of scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations. The purpose of the EIR is to evaluate and disclose the potential environmental consequences of the proposed Project. Consistent with the requirements of CEQA, the EIR analyzes the proposed Project's

potential environmental impacts, including impacts related to public health and the community (see i.e., Section 4.1, Aesthetics; Recirculated Section 4.2, Air Quality; Section 4.7, Greenhouse Gas Emissions; Recirculated Section 4.8, Hazards and Hazardous Materials; Section 4.9, Hydrology and Water Quality; Recirculated Section 4.10, Land Use and Planning; Section 4.11, Noise; Section 4.13, Public Services; Section 4.17, Utilities and Service Systems; and Chapter 5, Other CEQA Considerations).

As noted in the comment, the census tract that includes the Project site is identified in CalEnviroScreen as a disadvantaged community. The Project's census tract is large and includes all of the March ARB and the March JPA jurisdiction along with three blocks within the City of Moreno Valley, which appear to have been mapped as part of March JPA. Residential uses within the Project's census tract are limited to the Westmont Village retirement community off of Village West Drive, which was originally developed for retired military housing, Green Acres, which consists of 111 homes as part of the March Field Historic District, the US Veterans transitional housing facility, and the residential block surrounding the Cottonwood Golf Center, and a few scattered residences in blocks of Moreno Valley included in the census tract. These residential uses within the March ARB census tract are located approximately two miles from the Project site, the residents in Moreno Valley are to the east on the opposite side of I-215, and the retirement community is to the south of Van Buren Boulevard. For informational purposes, and to clarify the comment's reference to adjacent properties and residents living in the vicinity of the Project site, the census tracts adjacent to the Project site (6065042012, 6065042014, and 6065042013), which include the Mission Grove neighborhood, the residences located in Riverside County to the north of the Project site, and the Orangecrest neighborhood south of the Project site, are not identified by CalEnviroScreen as SB 535 disadvantaged communities or as overburdened with pollution.

O-8.23 This comment refers to a prior comment that the Draft EIR fails to properly analyze the Project's air quality impacts by not assessing impacts before the application of Project Design Features and that the Draft EIR's analysis of health risk does not comply with CEQA. Please see Response O-8.16 above. With regard to the pollution burden in the area, please see Response O-8.22 above. Specific comments regarding the Baseline Report referenced in the comment and regarding the Hazards and Hazardous Materials analysis in the EIR are provided and responded to below.

O-8.24 This comment raises concerns regarding potentially hazardous conditions in the Project area associated with Landfill No. 5 located east of the Project site. This area is also referred to as Area 3. The comment asserts that the EIR should include the landfill in the existing conditions and assess disturbance of the landfill in the Hazards and Hazardous Materials section because the landfill location is along the proposed extension of Cactus Avenue. Please see Recirculated Section 4.8, Hazards and Hazardous Materials, for a discussion of Landfill No. 5. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, construction of Cactus Avenue will not disturb the former landfill and no mitigation is warranted.

The former landfill referenced in the comment is described in the Phase I Environmental Assessment included as Appendix J-1 of the Draft EIR as well as the Leighton Supplemental Environmental Assessment included with this Final EIR as Appendix J-6. As discussed therein, Landfill 5 (Area 3) is not a current landfill, but a former landfill that was cleaned up in 1995 and 1996 by removal of 223,200 cubic yards of landfilled materials and soil. The Final Proposed Monitoring Strategy for MAFB Landfill Sites 3, 5, 20/26, 25, 30, and 40, prepared by Tetra Tech, Inc. in February 1998, indicates that confirmation

sampling conducted after the removal action confirmed the former landfill site was cleaned up to levels protective of human health and the environment, and no further action was recommended.

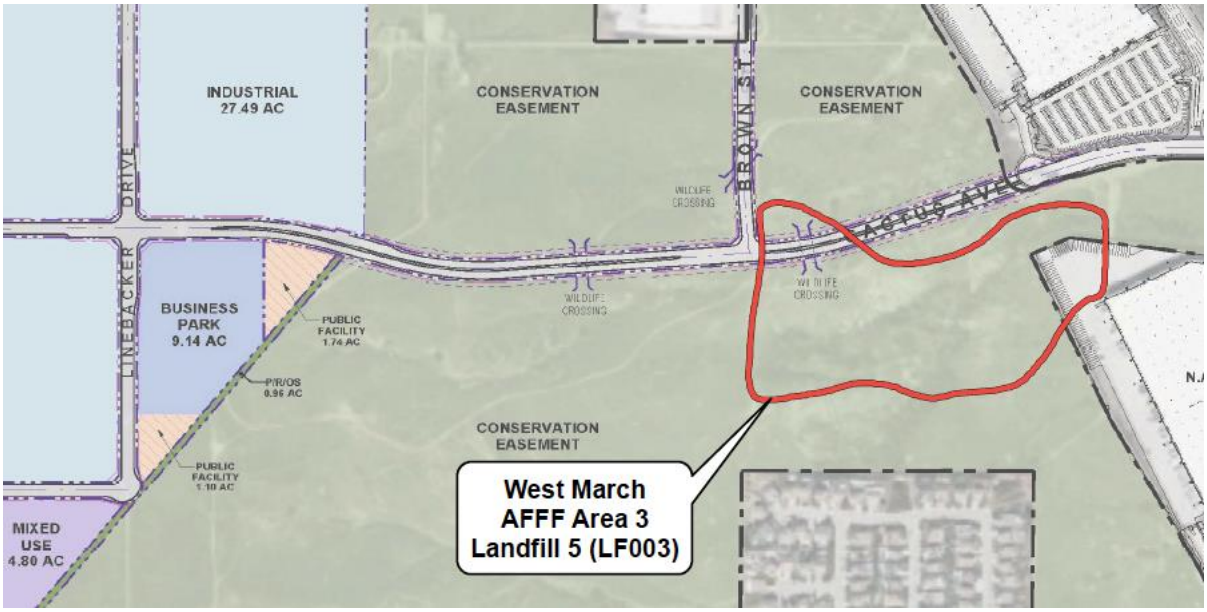
> "Confirmation sampling of soils following excavation indicated that remaining polycyclic aromatic hydrocarbons (PAHs) and organochiorine pesticides in the soils were below residential PROs. Arsenic and beryllium concentrations were above residential PROs but were similar to background levels for soils at West March. Site closure for the soil component was recommended based on confirmation sampling and removal of the waste and affected soils. Correspondence from the RWQCB indicates that for soils, site investigation and remedial action are completed and no further action for soils is needed." (TetraTech, 1998).

The California Regional Water Quality Control Board, Santa Ana Region (SARWQCB) concurred with the recommendation of no further action for soils. (SARWQCB, 1998).[16]

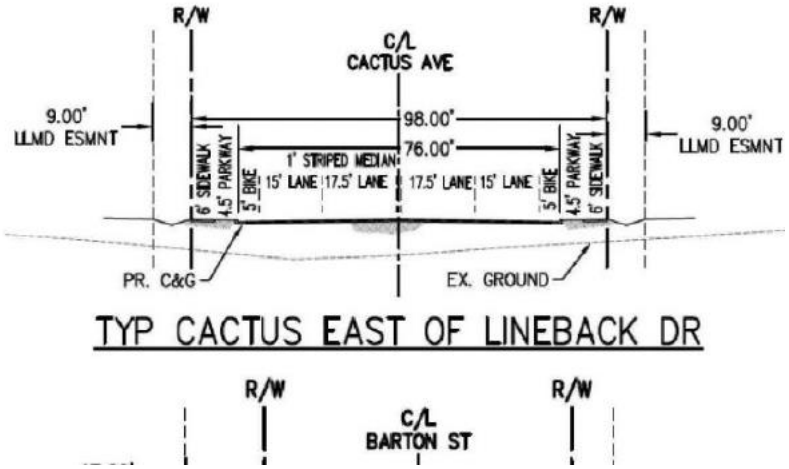
In addition, the Former March Air Force Base, California, Operable Unit 2, Air Force Real Property Agency Record of Decision (April 2004) is included as an attachment to the Phase I Environmental Assessment and includes additional detail on the former landfill. As specified therein, the former landfill site was restored by backfilling with clean soil and revegetating the site. "After the interim removal action, the site was restored by backfilling with clean soil and revegetating the site. In general, knolls and higher areas of excavation were covered with approximately 3 feet of soil and slopes adjacent to drainages were covered with 2 feet of soil Low-lying drainages were covered with 6 inches of soil." (2004 ROD). The ROD also noted that the former landfill "has been covered with clean backfill, interrupting the exposure pathway for any receptor." (2004 ROD). No restrictions on land use were required. Contrary to the comment's suggestion, this former landfill cannot be disturbed, as it was removed.

As seen in the figure below, only an approximate 500-footlong section of the proposed extension of Cactus Avenue crosses over the former Landfill No. 5 and is located east of Linebacker Drive. During construction, this area (approximately 72,000 square feet of total area over the former landfill) would be excavated to a depth of approximately five feet to structurally prepare the soils for fill and utilities, with the ultimate roadway surface located above the existing grade.

[16] https://documents.geotracker.waterboards.ca.gov/regulators/deliverable_documents/3976104557/1998-03-02_FinalMonitoringStrategy LandfillSites.pdf.



In that area, fill will be imported and placed above the existing ground surface in order to construct the road (page 10, TA Report).



Given that the former landfill materials were removed, backfilled with clean soil and the area was covered with an additional 3 feet of soil, and that construction of the road in this area will add more soil, the construction of the road over the former Landfill No. 5 will not result in the release of contaminants hazardous to human health.

Comments related to Per- and Polyflouroalkyl Substances (PFAS) referenced in the Baseline Report are provided and responded to below in Response O-8.34. As explained in that response, the Air Force recently tested soils in the former Landfill 5 and found no detections of PFOA, PFOS, or PFBS above screening criteria. The SARWQCB concurred with the conclusion that no additional soil sampling is recommended in the former Landfill 5 area.

As explained above, construction of Cactus Avenue will not disturb the former landfill and no mitigation is warranted.

0-8.25 This comment suggests that the Draft EIR does not adequately study the potential for unexploded ordnances and states that an unexploded ordnance survey should be prepared for the Project site, including the Conservation Easement, prior to redevelopment. Please see Recirculated Section 4.8, Hazards and Hazardous Materials, for an expanded discussion of prior analyses conducted on the Project site regarding unexploded ordnances. As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, the Project site includes areas that were used as part of the March Air Force Base operations for disposal of hazardous substances in undetermined quantities in areas that were then known as Installation Restoration Program (IRP) Sites 3, 25, and 40. Remediation activities were completed at all of these IRP sites, which were located within the proposed Conservation Easement and outside of the Development Area. As explained in the Recirculated Section 4.8, Hazards and Hazardous Materials, following completion of the remediation, the Air Force determined that all remedial actions to protect human health and the environment were taken and regulatory concurrence was provided by DTSC, Santa Ana Regional Water Quality Control Board (SARWQCB), and the EPA as documented in the Finding of Suitability for Transfer, included as Appendix J-3 of the Draft EIR.

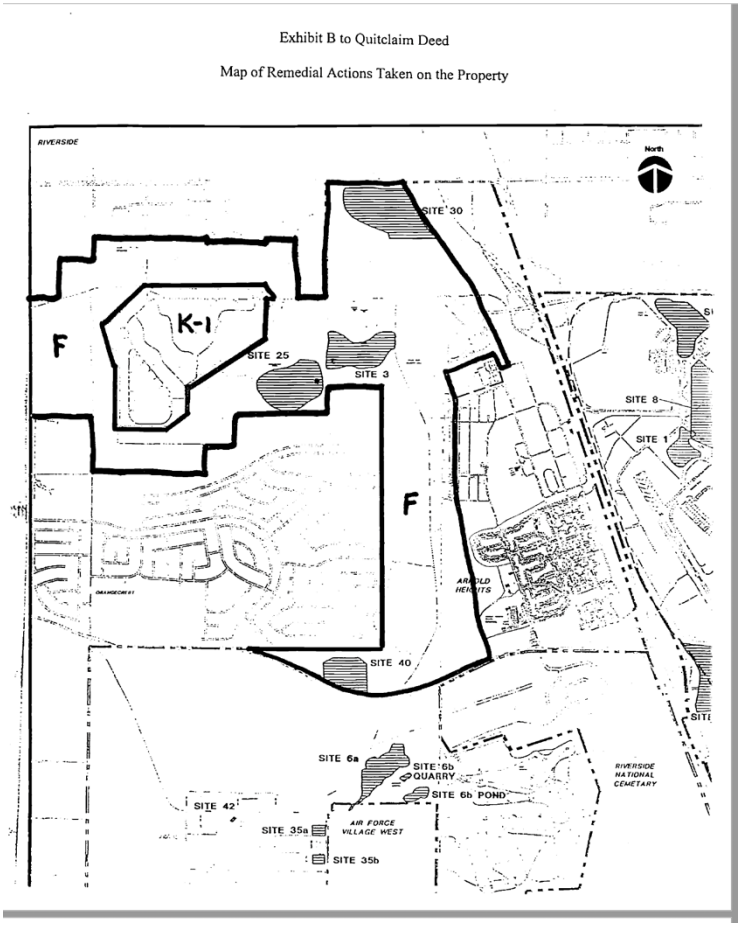
As explained in the Final EIR and the Phase I Environmental Assessment included as Appendix J-1, the proposed Specific Plan Area was formerly used for ordnance and munitions storage (with munitions stored indoors in secured concrete bunkers), and not ordnance and munitions disposal. Site 25, to the south of the Specific Plan Area, was used for munitions disposal and was the subject of a remediation effort in 1997. The Air Force's determination that all remedial actions taken were sufficient to protect human health and the environment was also supported by the March Air Force Base Operable Unit No. 2 Proposed Plan (September 1997), with concurrence letters from the DTSC, SARWQCB, and the EPA.

In addition, as described in Recirculated Section 4.8, Hazards and Hazardous Materials, the USAF MMRP, which addressed issues related to munitions and explosives of concern (including unexploded ordnance) and MCs associated with MRAs, evaluated actual or potential hazardous substances, pollutants, or contaminants on defense sites other than operational ranges. Based on the USAF MMRP, USAF concluded that there were no areas within the Specific Plan Area that require further munitions responses (USAF 2013).

Lastly, prior to release of the Draft EIR, Robert Estrada, the Base Realignment and Closure Environmental Coordinator, Former March AFB, CA researched the need for a unexploded ordnance survey of the Project Site, including all areas that would potentially be disturbed by Project construction activities in Parcels K-1 and F, which includes the Project site as well as the conservation easement areas (see figure below from the Finding of Suitability for Transfer, Appendix J-3 of the EIR). In an email dated May 4, 2022, he concluded that "there is no basis to conduct any response action, including unexploded ordnance survey at Parcels K-1 and F."[17] As such, considering that the only earthwork activities would occur within the Specific Plan Area where munitions were primarily stored in concrete bunkers and the area where munitions were disposed, detonated, and buried has been remediated to the satisfaction of all overseeing regulatory agencies, the potential for adverse effects related to unidentified unexploded ordnance would be less than significant, and no mitigation, including an unexploded ordnance survey, is required. In the extremely unlikely event unidentified unexploded

[17] Email dated May 4, 2022 from R. Estrada (USAF) to D. Fairbanks (March JPA).

ordnance remains withing the Specific Plan Area, MM HAZ-1 requires that all ground disturbing activities shall be conducted by workers trained to look for any suspect contamination, including unidentified unexploded ordnance.



Moreover, the Project does not include the development of trails or any parking lots to serve the trails that would change or increase the existing use of trails in the conservation area.

Please see Response 0-8.33 below for additional detail.

0-8.26 This comment references MM-HAZ-1, which addresses the abatement of hazardous building materials. As the comment notes, MM-HAZ-1 addresses the removal of 42 pole-mounted transformers on the Project site and requires an assessment of nearby soils and/or hardscapes for PCBs in accordance with the requirements set forth in 40 CFR 761 in the event that transformer oil is identified or suspected in underlying soils during removal activities. The comment requests that mandatory testing for PCBs in soil surrounding all poles with transformers be conducted now and that mitigation measures be included to address any contamination. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, the identification, removal, and disposal of PCBs are regulated by the EPA under the Toxic Substances Control Act (TSCA) and California regulations.

As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, the site investigations did not rely solely on visual inspections. Five exploratory trenches were completed during the Phase II investigation at two electrical substation areas which had multiple former elevated electrical transformers (adjoining Building 2 and Building 4). Two exploratory trenches were also completed near pad-mounted transformers (adjoining Building 5 and at northeast edge of the Ordnance Storage Bunkers Area). The results of this investigation are as follows:

- Electrical Substation Areas (Building 2 and Building 4): No detected PCBs were reported in any of ten soil samples analyzed from this area, with the exception of one sample (ES1-3-2.5), which was reported to contain 0.009 mg/kg of only one isomer of PCB (i.e PCB1254). This is below the 0.59 to 0.97 mg/kg DTSC and USEPA soil screening levels for soil in a commercial/industrial use scenario, and is also below the DTSC and USEPA soil screening level for residential use of 0.24 mg/kg.
- Pad Mounted Electrical Transformers (Bldg. 5 & NE Edge of Ordnance Bunker Area): No detected PCBs were reported in any of six soil samples analyzed from this area.

The Phase II investigation recommended that a subsequent Hazardous Materials Survey be conducted at the Project site to evaluate the potential presence of PCBs and treated wood waste related to 42 pole mounted transformers. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, a Hazardous Material (PCB/Treated Wood Waste) Investigation Report was completed on May 5, 2022 (PCB Report). The PCB Report tested the following materials for PCBs:

- Dielectric fluids within Pole-mounted transformers
- Black Electrical Feed Wrap associated with power poles
- Capacitors found on the ground within and just outside of Building 5

One of three samples collected of pole-mounted transformer dielectric mineral oil was determined to contain 1.5 mg/kg of Aroclor 1260, which is well below the regulatory level of concern of 50 mg/kg set forth in 40 CFR 761. No PCB/Aroclor was identified in either of the other two samples collected. No PCBs were detected in any of the three samples of black electrical feed wrap or the three samples of loose capacitors at Building 5 (all capacitors found were the same make and model). With respect to PCBs in soil, the PCB Report notes that "[i]n the event that transformer oil is found to have leaked into the soil below, the oil-impacted soil should be assessed for PCB content. No such leakage was observed at the various sampling locations visited on 23 February 2022."

The PCB Report was included with Recirculated Section 4.8, Hazards and Hazardous Materials, as Appendix J-5.

DTSC, the expert agency in California that regulates hazardous wastes and materials "does not recommend sampling of building materials or surrounding media unless there is evidence of a PCB release that may lead to exposure." (DTSC HERO HHRA Note 8, 2020). As explained above, based on extensive testing, there is no evidence of a PCB release on the Project site that may lead to exposure.

Leighton Consulting, Inc. (Leighton), the environmental expert associated with the Project, provided additional guidance on PCB sampling through Vista Environmental Consulting (Vista). In the Leighton Report on PCB Issues, dated November 3, 2023, Vista notes that, contrary to the comment, dielectric fluids are almost never clear.

> "Rather, 95%+ of PCB-containing dielectric fluids are either yellow (Monsanto products) or Amber (Pyranol products). If/when released due to transformer or capacitor failure, the fluids tend to be darker, ranging from brown to black, due to thermal effects of overheating (the most common failure that causes uncontrolled releases." (Leighton, 2023)

Therefore, it is possible to detect a possible leak of transformer fluid that contains PCBs.

As explained in the Recirculated Section 4.8, Hazards and Hazardous Materials, any testing and abatement of PCBs would be required to be completed in accordance with all federal, state, and local laws and regulations, and the contractor would have to provide written documentation to March JPA confirming such compliance upon completion of abatement measures if applicable. In addition, MM-HAZ-1 requires that all ground disturbing activities be conducted by workers trained to look for any suspect contamination. As explained in the Recirculated Section 4.8, Hazards and Hazardous Materials, with implementation of MM-HAZ-1, impacts related to PCBs would be less than significant. Comments referenced in the Baseline Report are provided and responded to below.

O-8-27 This comment summarizes previous comments regarding public health effects on sensitive receptors. Consistent with the requirements of CEQA, the Draft EIR, Recirculated Section 4.2, Air Quality, and Recirculated Section 4.8, Hazards and Hazardous Materials, presents a comprehensive assessment of the Project's potential significant environmental impacts, including with regard to air quality and hazards and hazardous materials, identifies project design features and feasible mitigation measures that avoid and reduce the Project's adverse environmental impacts, addresses a reasonable range of alternatives to the proposed Project, and, on an overall basis, informs the governmental decision-makers and the public regarding the Project's potential environmental impacts. Specific comments regarding the Draft EIR are provided and responded to above.

O-8.28 The comment discusses CEQA requirements regarding analysis of environmental impacts including cumulative impacts. The comment lists proposed warehouse, commerce center, and business park projects in the March JPA, Riverside, Moreno Valley, Perris, and unincorporated Riverside County jurisdictions that the commenter suggests the Draft EIR should have included, and states that together these projects would contribute significantly to impacts related to traffic, public safety, air quality, greenhouse gas emissions, public health impacts, and noise. As set forth in the CEQA Guidelines, the analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to "be guided by the standards of practicality and reasonableness" (CEQA Guidelines Section 15130(b)). Contrary to the comment's suggestion, the EIR includes analysis of the Project's potential cumulative environmental effects consistent with the requirements of CEQA. The cumulative effects analysis methodology is explained in Chapter 4.0, Environmental Analysis, of the Draft EIR and Topical Response 7 – Cumulative Projects. The Draft EIR notes that consistent with CEQA, the cumulative impacts discussion is guided by the standards of practicality and reasonableness. As explained in Chapter 4.0, Environmental Analysis, Section 15130(b)(3) of the CEQA Guidelines states that "lead agencies shall define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used." The Draft EIR further explains

that unless otherwise indicated in the analysis, the geographic scope used in the cumulative analysis includes the March JPA planning area. However, as noted in the Draft EIR, there are environmental issues whose relevant geographic scope for purposes of cumulative impact analysis may be larger or smaller than this area, and may be defined by local, regional, or state agency jurisdiction or by other environmental factors. For example, as set forth in Table 4-1 in the Final EIR, the geographic area for cumulative impacts analysis for air quality (toxic air contaminants and odors) is the immediate vicinity, while the geographic area for cumulative impacts analysis for air quality (construction/mobile sources) and greenhouse gas emissions is the South Coast Air Basin. Please see Topical Response 7 – Cumulative Projects for additional information. Table 4-2 in Chapter 4.0, Environmental Analysis provides the cumulative project list, which, as the Draft EIR explains, was developed for purposes of the EIR analysis through consultation with planning and engineering staff from March JPA, the County of Riverside, and the cities of Riverside and Moreno Valley to include key projects in the March JPA planning area and in the City of Riverside, County of Riverside, and City of Moreno Valley.

Please see the Final EIR and Appendix C-1 for an expanded discussion and analysis of cumulative conditions and impacts. As explained in the Appendix C-1, the cumulative geographic context for air quality impacts is the South Coast Air Basin (SCAB). Because the "millions of square feet of proposed warehouse facilities, commerce centers, and business parks in the region" mentioned by the commenter are located within the SCAB, they are considered as part of the air quality analysis for the Project, since these projects are subject to CEQA and would all be required to implement mitigation measures as part of the uniform CEQA review process. The emissions presented in the Final EIR represent static worst-case opening year conditions. Because passenger vehicle and truck emissions standards continue to improve, it is expected that emissions would continue to decrease with each year. As a result of implementation of USEPA's Exhaust Emission Standards for Heavy-Duty Highway Compression Ignition Engines and Urban Buses and CARB's Truck and Bus Regulation, truck DPM emission factors have been reduced by 96% and NO_x emission factors have been reduced by 87% between 2000 and 2023. Similarly, DPM emissions from TRUs have been reduced by 68% from 2000 to 2023, and with CARB's amendments to the TRU ATCM are expected to be reduced further by 81% between 2023 and 2040. The EIR did not underrepresent the cumulative conditions and properly disclosed the Project's cumulative impacts.

O-8.29 This comment discusses the alternatives analysis and CEQA Guidelines provisions on alternatives generally and also states that the Draft EIR's alternatives analysis is flawed and should include an alternative with no warehouse use. Among several citations in the comment related to alternatives, the comment cites Public Resources Code Section 21102 for the proposition that projects should not be approved if feasible alternatives would substantially lessen environmental impacts; however, the referenced CEQA section relates to feasibility and planning studies associated with state agency funding requests and does not address alternatives. The comment refers also to CEQA Guidelines Section 15126(d), which relates to growth-inducing impacts. Growth-inducing impacts are addressed in Section 5.5 of the Draft EIR. With regard to the alternatives analysis, as set forth in the CEQA Guidelines, an EIR need not consider every feasible alternative to a project. (CEQA Guidelines Section 15126.6(a)). The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. Per the CEQA Guidelines, "[t]here is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." (CEQA Guidelines, Section 15126.6(a)). As further explained in the CEQA guidelines and discussed in Chapter 6, Alternatives, the "rule of reason" requires the EIR to set forth only those

alternatives necessary to permit a reasoned choice. (CEQA Guidelines Section 15126.6(f)). Per the CEQA Guidelines, the alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project, and, of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. (CEQA Guidelines Section 15126.6(f)).

With regard to the comment's suggestion that the alternatives analysis is flawed because the Draft EIR inaccurately represents the Project's impacts, please see Table 6-1, Comparison of Project and Alternatives Impacts, in the Final EIR. Specific comments regarding the impact analysis in the Draft EIR are provided and responded to above and below. Contrary to the comment's suggestion, the Draft EIR does not fail to disclose the Project's environmental impacts.

The comment suggests that the Draft EIR violates CEQA by not including a non-warehouse alternative. As explained in Topical Response 8 – Alternatives, in response to comments, Alternative 5 – Non-Industrial Alternative has been included in the EIR alternatives analysis. Please see the full description and analysis of Alternative 5, which includes analysis of emissions associated with construction and operations and vehicle trips. As discussed in greater detail in the alternatives analysis, Alternative 5 would result in more criteria air quality pollutant emissions and fewer diesel particulate matter emissions during operations when compared to the Project, and air quality impacts would still be considered significant and unavoidable under Alternative 5. With regard to vehicle trips, Alternative 5 would substantially reduce truck trips but nearly double vehicle trips as compared to the proposed Project. Under Alternative 5, the shifts in land use to non-industrial uses would result in a corresponding increase in overall vehicle trip generation and an associated increase in VMT over the proposed Project. As such, Alternative 5 would result in greater VMT impacts and introduce a new significant impact when compared to the proposed Project. Consistent with the comment's suggestion, the analysis of Alternative 5 also evaluates the Alternative's success at meeting Project objectives.

Comments referenced in the Baseline Report are provided and responded to below.

0-8.30 This comment discusses Government Code requirements regarding consistency of a jurisdiction's development decisions with the applicable general plan and suggests that the Project is directly inconsistent with numerous provisions in the March General Plan in violation of state law. The comment cites three examples: General Plan Land Use Element Policies 2.4, 3.2, and 4.1. Table 4.10-1 of Recirculated Section 4.10, Land Use and Planning, determined the Project would be consistent with Land Use Element Policy 3.2 because industrial uses are currently east and northeast of the Project site. The Project would extend Brown Street south and Cactus Avenue west to provide access and utility infrastructure to the Campus Development. Only the Park and open space amenities would be accessible off of the Barton Street extension. With the implementation of the mitigation measures presented in this EIR, impacts on natural environmental resources would be minimized. Regarding Land Use Element Policy 4.1, the Project would be consistent because the Project proposes the adoption of a Specific Plan with development standards and guidelines necessary to develop the Project site consistent with the proposed General Plan Amendment. With approval of the Specific Plan, design guidelines would establish architectural styles, signage, parking, and landscaping standards that would develop a Project identity and foster quality development through the Project's buildout scenario. Regarding Land Use Element Policy 2.4, the Project would be consistent because under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2,

March JPA General Plan Existing and Proposed Land Use Designations. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. The Conservation Easement will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.

Additional goals and policies of the March JPA General Plan were considered in the analysis included in Recirculated Section 4.10, Land Use and Planning. As demonstrated in detail in Table 4.10-1 of Recirculated Section 4.10, Land Use and Planning, the Proposed Project is generally consistent with the relevant goals and applicable policies identified in the General Plan Land Use Element, as well as the other six elements of the March JPA General Plan. In addition, as explained in cases cited by the comment, "[a] given project need not be in perfect conformity with each and every general plan policy. To be consistent, a project must be compatible with the objectives, policies, general land uses and programs specified in the general plan."[18] Further, "[b]ecause policies in a general plan reflect a range of competing interests, the governmental agency must be allowed to weigh and balance the plan's policies when applying them, and it has broad discretion to construe its policies in light of the plan's purposes."[19] In addition, we note that while CEQA Guidelines Section 15125(d) requires EIRs to discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans, an inconsistency does not necessarily mean a potentially significant conflict under CEQA. Threshold LU-1 asks: Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? So unless (1) the applicable plan, policy or regulation was "adopted for the purpose of avoiding or mitigating an environmental effect" and (2) the conflict would cause a significant environmental impact, any inconsistency would not be a potentially significant conflict under CEQA. Inconsistency with policies that do not avoid or mitigate an environmental effect would not be considered potentially significant under CEQA.

O-8.31 This concluding comment is conclusory in nature and states that based on the comments above, the commenter believes the EIR does not satisfy the requirements of CEQA. Responses to the commenter's specific comments on the Draft EIR are provided and responded to above. As explained in Responses to Comments O-8.1 through O-8.30 above, the Draft EIR adequately analyzed the proposed Project and evaluated and disclosed the potential environmental impacts associated with the proposed Project, consistent with the requirements of CEQA. The EIR is comprehensive and none of the circumstances requiring recirculation of a draft EIR set forth in CEQA Guidelines Section 15088.5 have been met. Specifically, based on the comments and responses within this Final EIR, no new significant impacts or substantial increases in already identified significant impacts have been identified.

[18] *Families Unafraid to Uphold Rural El Dorado County v. Bd. of Supervisors of El Dorado County*, 62 Cal.App.4th 1332, 1336 (1998); *Napa Citizens for Honest Government v. Napa County Bd. Of Supervisors*, 91 Cal.App.4th 342, 378 (2001) (internal citations omitted).

[19] *Napa Citizens* at 386.

Responses to Appendix A, Baseline Environmental Consulting Report (March 8, 2023)

0-8.32 This introductory comment summarizes the Baseline Report. As explained in the following responses, the Baseline Report has not identified any flaws in the draft EIR that require recirculation.

0-8.33 Please see Response 0-8.25 above. The Baseline Report references a report prepared by Cabrera in 2006. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, as well as the Leighton Supplemental Environmental Assessment (Appendix J-6) this report was reviewed by the SARWQCB, who concluded: "We concur with your finding of no release at the site, and the recommendation for no further action for the Weapons Storage Area." (SARWQCB, 2006).

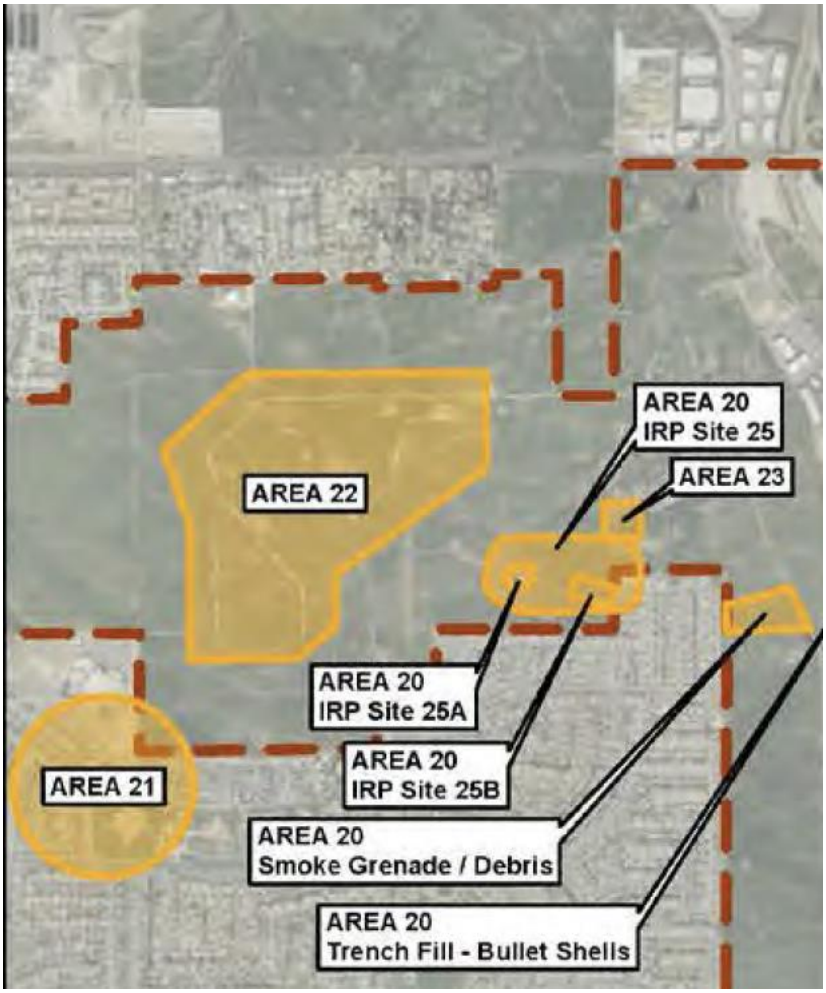
In addition, it is noted that a Final Comprehensive Site Evaluation Phase I Report was prepared for the Military Munitions Response Program in March 2013 (USAF MMRP). As identified therein, "[t]he goal of the USAF MMRP is to make munitions response areas (MRAs) safe for reuse and to protect human health and the environment. The USAF MMRP addresses issues related to munitions and explosives of concern (MEC) and munitions constituents (MC) associated with MRAs, as well as evaluates actual or potential hazardous substances, pollutants, or contaminants on defense sites other than operational ranges."

MEC is defined as "military munitions that possess unique explosive risks including: 1) unexploded ordnance (UXO), 2) discarded military munitions (DMM), or 3) MC present in high enough concentrations to pose an explosive hazard." MC is further defined as "any materials originating from UXO, DMM, or other military munitions, including explosive and non-explosive materials, and emission, degradation, or breakdown elements of such ordnance or munitions. The primary concerns with MC are human health and ecological hazards."

Munition Response is defined as "Response actions, including investigation, removal actions, and remedial actions to address the explosives safety, human health, or environmental risks presented by unexploded ordnance (UXO), discarded military munitions (DMM), or munitions constituents (MC), or to support a determination that no removal or remedial action is required."

As discussed in the Recirculated Section 4.8, Hazards and Hazardous Materials, USAF conducted a conceptual site evaluation (CSE) based on a review of historical information, site visits, and interviews. The purpose of the CSE was "to identify areas where past military munitions activities or potential [munitions response areas] MRAs associated with March ARB may pose a risk to human health or to the environment." USAF considered an inventory of range-related activities that included all activities associated with the potential use, storage, and disposal of military munition. On the Project site, USAF identified the following areas as having known or suspected range-related activities, as shown in the figure excerpted from the USAF MMRP below:

1. Area 22: the former ordnance storage area (WSA);
2. Area 20: Installation Restoration Programs Site 25;
3. Area 23: suspected TNT rinsate ponds.
4. Portion of Area 21: Demolition Area (ammunition disposal)



Areas 22 and 23 were identified as a munitions storage area (the former Weapons Storage Area), while Areas 20 (Site 25 discussed below) and 21 were identified for possible munitions disposal. Note that Area 21 only overlaps very slightly onto the Project site, but primarily consists of the area containing Grove Community Church and Preschool and nearby residential uses.

These sites were evaluated to determine whether they required a further munitions response (i.e. qualified as a munitions response area). Sites were qualified as a potential for further munition response (potential MRA) for several reasons, including if the site:

- Location can be identified;
- Is owned by the DoD;
- Existence is supported by data; or
- Records of munitions use are identified.

Potential MRAs were identified to be ineligible for USAF MMRP for several reasons, including if the site:

- Is an active or operational munitions area or range;
- Is previously identified as formerly used defense site (FUDS);

- Contained a small arms range that was completely indoors;
- Is more appropriately managed under another program, such as FUDS or Environmental Restoration Program (ERP); or
- Is more appropriately managed under another service MMRP.

As discussed in the Recirculated Section 4.8, Hazards and Hazardous Materials, USAF determined further munitions responses are not required for Areas 20 and 22 because they had been addressed by earlier clean up actions, referred to as "Installation Restoration Programs" or "IRPs" in the report. Further munition response is not required for Area 23 because "[b]ased on review of the historical data, the existence of the Suspected TNT Rinsate Ponds could not be confirmed." These rinsate ponds were suspected to exist in the same areas as Landfill No. 5 (Area 3), which has been extensively remediated and investigated by the Air Force, with oversight from numerous regulatory agencies. Finally, further munition response is not required in Area 21 (Grove Community Preschool) because it was addressed under the Formally Used Defense Sites (FUDS) program. Project No. J09CA00110 "and is used by children as a play area with a residential area across the street."

Based on this report, the USAF has not identified any areas within the Specific Plan area that require further munitions responses (see screenshot below from this report).

HRR Identified Sites	CSE Phase I Results	Recommendations
CATM SAR (1,000" Range/CATM Range (Building 6006)/SAR Drainage Ditch)	**MEC Results**: N/A* **MRSPP Score**: Not scored	Should not be included in the USAF MMRP inventory and no further munitions response is required at this time
Poorman Gunnery Range	**MEC Results**: N/A* **MRSPP Score**: Not scored	Should not be included in the USAF MMRP inventory and no further munitions response is required
1944 Rifle Range	**MEC Results:** N/A* **MRSPP Score**: Not scored	Should not be included in the USAF MMRP inventory and no further munitions response is required
Skeet Range – 400, 401, and 402	**MEC Results**: N/A* **MRSPP Score**: Not scored	Should not be included in the USAF MMRP inventory and no further munitions response is required
Munitions Residual Burial Site (IRP 25)	**MEC Results**: N/A* **MRSPP Score**: Not scored	No further munitions response is required
Demolition Area (ammunition disposal)	**MEC Results**: N/A* **MRSPP Score**: Not scored	Should not be included in the USAF MMRP inventory and no further munitions response is required
Former March AFB WSA	**MEC Results**: N/A* **MRSPP Score**: Not scored	Should not be included in the USAF MMRP inventory and no further munitions response is required
Suspected TNT Rinsate Ponds	**MEC Results**: N/A* **MRSPP Score**: Not scored	No further munitions response is required
Active LEFs	**MEC Results**: N/A* **MRSPP Score**: Not scored	No further munitions response is required

N/A = Not Applicable
* = This area either did not qualify as a potential MRA or was not eligible for USAF MMRP and so was not evaluated for MEC under this CSE Phase I Investigation. See **Table 11-1** for additional details.

As stated above, the Project is not building trails or any parking lots that would change or increase the existing use of trails in the conservation area.

As explained in Response O-8.25, in response to this comment Robert Estrada, the BRAC Environmental Coordinator, Former March AFB, CA researched the need for an unexploded ordnance (UXO) survey of the Project site, including all areas that would potentially be disturbed by Project construction activities. In an email dated May 4, 2023, he concluded that "there is no basis to conduct any response action, including UXO survey at Parcels K-1 and F."

Moreover, Parcels K-1 and F include the Project site, as well as all of the conservation easement areas. Therefore Mr. Estrada's conclusion that no UXO survey is required applies to the conservation areas. This conclusion is further supported by the USAF finding that no further munition response is required for any part of the Specific Plan area.

The commenter specifically expresses concern related to Site 25. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, and Phase I ESA (Appendix J-1), "Site 25, was the designated area for disposal and historically used for open air detonations, burning, and burial of munitions and munitions residue. Site 25 was the subject of a remediation effort in 1997 and was determined by the Air Force that all remedial actions taken were sufficient to protect human health and the environment (Appendix J-3)."

More detail regarding UXO is provided in the Site 25 Closure Report (TetraTech, 1997), which is attached to the 2009 Closure Report.[20]

- "During the period of September 27, 1996, through October 18, 1996, unexploded ordnance (UXO) specialists from IT Corporation excavated the pits, shallow trenches, and anomalies located by geophysical surveys at Site 25. All of the recovered munitions residues and affected soils were transported to Site 6, Cell B, for disposal."
- Soil sampling was performed as part of the closure, and the Site 25 Closure Report noted that "Industrial reuse is currently planned for Site 25; however, no restrictions are necessary because the soils remaining on-site meet the more stringent PROs for residential soils."
- As a result, "Site closure is recommended for the following reasons:
    - All ordnance, munitions residue, and underlying affected soils have been removed.
    - Per U.S. Department of Defense requirements, the top 10 feet of soils were verified by geophysical surveys as containing no metallic items.

The Final Operable Unit (OU) 2 Record of Decision (ROD) was issued in April 2004 and documented the selection of No Further Action (NFA) as the final decision for closure of Site 25. No restrictions on the future use of Site 25 are required in the ROD.

As detailed in Recirculated Section 4.8, Hazards and Hazardous Materials, there is no indication that UXO would be present in the conservation areas, or anywhere else within the Specific Plan area. Therefore, the additional surveys and testing recommended by the comment are not required. However, in the extremely unlikely event UXO remains withing the Specific Plan Area, MM HAZ-1 requires that all

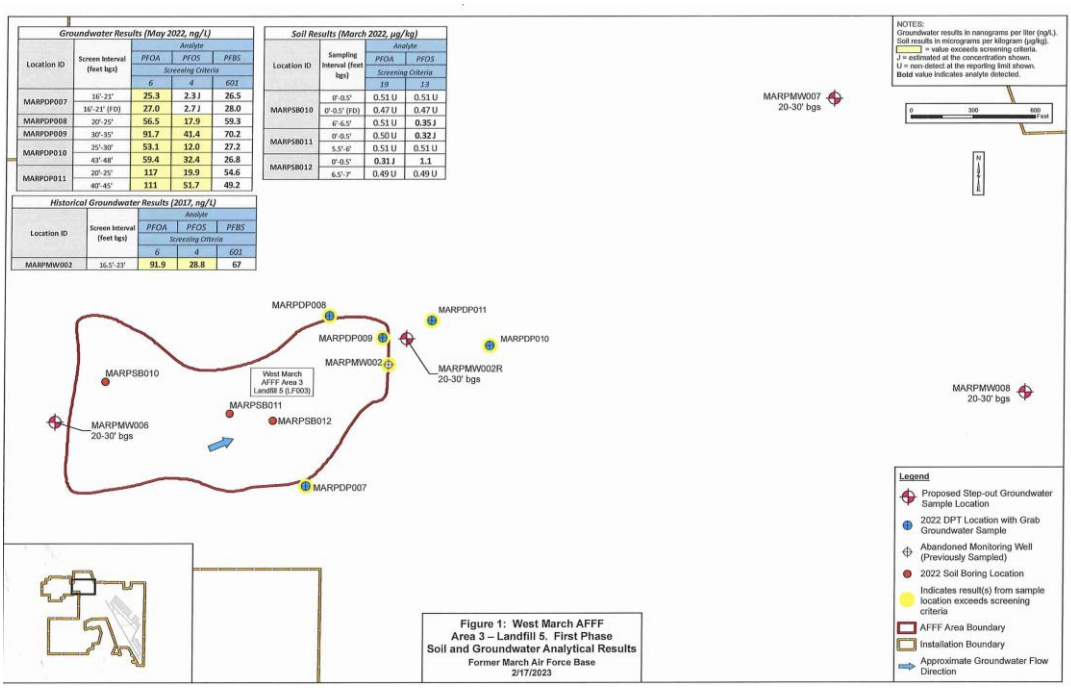
[20] USAF, 2009 Closure of Military Munitions Response Program (MMRP) Site WP025, Munitions Residue Burial Site at the Former March Air Force Base, California.

ground disturbing activities shall be conducted by workers trained to look for any suspect contamination, including UXO.

0-8.34 This comment explains that the proposed extension of Cactus Avenue would be constructed over a small portion of a former landfill. Please see Response 0-8.24 above. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, the former landfill referenced in the comment is described in the Phase I Environmental Assessment included as Appendix J-1 of the Draft EIR. Please see Recirculated Section 4.8, Hazards and Hazardous Materials, for a discussion of Landfill No. 5. As discussed therein, Landfill 5 (Area 3) is not a current landfill, but a former landfill that was cleaned up in 1995 and 1996 by removal of 223,200 cubic yards of landfilled materials and soil. The 2004 Record Of Decision (ROD) states that "Confirmation sampling conducted after the interim removal action confirmed that the site had been cleaned to levels protective of human health and the environment. No restrictions on land use are required." As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, construction of Cactus Avenue will not disturb the former landfill and no mitigation is warranted.

The comment also notes that in May 2022, the Air Force prepared a Final Quality Program Plan (QPP) for the Remedial Investigation of PFAS at the Former March Air Force Base (AFB) and March Air Reserve Base (ARB) (the PFAS QPP). The PFAS QPP was conducted to "[d]etermine the nature and extent of PFAS (perfluorooctane sulfonate [PFOS], perfluorooctanoic acid [PFOA], and perfluorobutane sulfonic acid [PFBS]) in soil and groundwater" at the March AFB. The Preliminary assessment determined that the only potential release location within the Specific Plan area was the West March AFFF Area Landfill No. 5, which is also known as and referred to as Area 3.

The comment fails to note that soil samples were collected from three locations within the former Landfill No.5 and there were "[n]o detections of PFOA, PFOS, or PFBS above screening criteria" and, as such, "[n]o additional soil sampling is recommended." (Meeting Minutes, February 2023). As seen in the Figure below, sample location MARPSB010 is the closest sample location to the Cactus Road extension, and no PFAS was detected above the screening levels. Screening criteria for delineation in the remedial investigation are the May 2022 USEPA RSLs using a hazard quotient of 0.1. The SARWQB concurred with the meeting minutes on April 3, 2023. (SARWQB, 2023)



As such, Recirculated Section 4.8, Hazards and Hazardous Materials, concludes that there is no indication that a roadway constructed over this area will disturb soils containing substantial PFAs or other hazardous compounds and, further, that "The extension of Brown Street and Cactus Avenue are unlikely to disturb soils containing hazardous substances or PFAS in the area of former Landfill 5 (aka Site 3)."

Finally, the comment expresses concern related to potential impacts from changes to drainage patterns and stormwater runoff that could potentially increase leaching of soil contamination to groundwater. As explained above, former Landfill 5 has been remediated. Following the remediation of former Landfill 5 in the late 1990s, no plans were implemented to divert natural stormwater infiltration from this area, and the surface of this area has remained largely unimproved dirt with scattered vegetation. The 2004 ROD states the following:

> "potential residual metals in sediments and surface water after the removal action do not pose a risk above the manageable risk range identified in the NCP to residential receptors based on RPRGs and background soil concentrations."
>
> "The removal action at Site 3 has eliminated the potential for migration of contaminants to groundwater."

Continued infiltration of stormwater over the past few decades does not appear to have been a concern to the USAF or regulating agencies.

With the exception of a small segment of the proposed Cactus Avenue extension, there are no plans for improved surfaces (concrete, asphalt, or other surfaces which might alter surface water drainage) within 1,500 feet of the former Landfill 5 area.

As detailed in the Project Phase II ESA (Appendix J-2), all concentrations of potential compounds of concern analyzed for in soil samples are below the relevant commercial/industrial screening levels (with the exception of arsenic, which is well below the more relevant applicable background concentration) (Leighton, 2022).

As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, further analysis of these soil data was conducted, comparing it also to USEPA and DTSC soil screening levels for a residential scenario, as well as construction worker environmental screening levels (ESLs) published by the San Francisco Regional Water Quality Control Board (SFRWQCB). The Santa Ana RWQCB does not publish construction worker screening levels. The SFRWQCB ESLs are considered conservative and are used by other water boards and environmental regulatory agencies for guidance. Provided as an attachment to the Leighton Response to Comments (Appendix J-7 of the Final EIR) are the tabulated historical soil data (Table nos. 1 and 2) together with these additional soil screening levels (at bottom of tables), and a copy of the SFRWQB soil ESLs.

Table nos. 1 & 2 in Appendix J-7 indicate all compounds are below all of the indicated soil screening levels (commercial/industrial, residential and construction worker). Given that all concentrations of analyzed compounds in the soil samples are well below the screening levels for hypothetical on-site construction workers or hypothetical on-site residential occupants, there is no indication of a likely unacceptable health risks to the occupants of neighboring properties, related to these compounds and the proposed construction activities.

As explained in Response 0-8.24 and above as well as within the Recirculated Section 4.8, Hazards and Hazardous Materials, there is no evidence construction of the Project would result in adverse impacts to human health or the environment as a result of historic uses.

0-8.35 Please see Response 0-8.26 above for a summary of the PCB-related sampling activities at the Project site. While commenter notes that releases of "transformer oil cannot always be easily identified," the sampling conducted in connection with the PCB Report was conducted by a specially contracted environmental consultant who has expertise in this area and that report indicated that "[n]o such leakage was observed at the various sampling locations visited on 23 February 2022." Dielectric fluids are almost never clear. Rather, more that 95% of PCB-containing dielectric fluids are either yellow (Monsanto products) to Amber (Pyranol products). If/when released due to transformer or capacitor failure, the fluids tend to be darker, ranging from brown to black, due to thermal effects of overheating (the most common failure that causes uncontrolled releases.) Therefore, it is possible to detect a possible leak of transformer fluid that contains PCBs.

0-8.36 This comment suggests that the Draft EIR should be revised to first evaluate the project's air quality impacts without implementation of PDF-AQ-1 (requires all offroad equipment used during construction meet the California Air Resources Board Tier 4 Final emission standards or better), and then evaluate the effectiveness of PDF-AQ-1 to reduce air quality impacts. Recirculated Section 4.2, Air Quality, evaluates Project impacts with and without the inclusion of PDF-AQ-1, which is identified now as MM-AQ-1. The use of Tier 4 Final equipment is now required under MM-AQ-1 of Recirculated Section 4.2, Air Quality.

0-8.37 Please see Response 0-8.15 above regarding emergency generators.

0-8.38 This comment requests cumulative health risk impacts analysis along the Project's truck routes and use of U.S. EPA's community-scale cancer risk threshold of 100 in a million. Please see Recirculated Section 4.2, Air Quality, for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in a million or less requested by the comment.

0-8.39 This comment requests that the Final EIR include a discussion of the Project's consistency with the 2022 version of CALGreen. The proposed Project would be required to meet or exceed the applicable Title 24 and CALGreen code in place at the time of building permit submittals. As further discussed in Response 0-8.40 below, PDF-GHG-1 requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. MM-AQ-11 requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code. MM-GHG-7 has been revised to require each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with the nonresidential voluntary Tier 2 standards of the 2022 CALGreen Code. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

0-8.40 This comment requests that the Project is designed to ensure it will achieve carbon neutrality by 2045 and requests installation of EV parking and PV infrastructure beyond the minimum requirements of 2022 CALGreen to reduce the project's GHG emissions and align the project with California's long-term climate goal of carbon neutrality by 2045.

As discussed in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR and Section 6.1.3 of the Project Greenhouse Gas Analysis (Appendix I), the Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 CARB Scoping Plan. In response to this comment, MM-GHG-7 was revised to require compliance with the 2022 CALGreen Nonresidential Voluntary Tier 2 measures for EV chargers and infrastructure. This results in the following changes to the EV chargers and infrastructure for Buildings B and C (both of which have site plans included in the EIR).

Building	Total Parking Spaces	2022 CALGreen Required EV Capable Spaces	2022 CALGreen EVCS (EV Capable Spaces Provided with EVSE)	2022 Tier 2 EV Capable Spaces	2022 Tier 2 EVCS
B	545	109	28	246	82
C	306	62	16	138	46

As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), a majority of the GHG emissions associated with the Project are emitted by passenger cars and trucks visiting the Project, as well as building energy usage. MM-GHG-12 requires each Project site plan demonstrate implementation of measures sufficient to attain a minimum of 100 points under the County of Riverside CAP. Under PDF-AQ-1, no development within the Specific Plan Area will utilize

natural gas. MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. MM-AQ-6 requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent, at a minimum. MM-AQ-8 requires all TRU loading docks provide electrical hookups and all other loading docks are designed to be compatible with SmartWay trucks. PDF-GHG-1 requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. MM-AQ-11 requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code. MM-GHG-7 requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with the nonresidential voluntary Tier 2 of the 2022 CALGreen Code. MM-AQ-24 prohibits the use of diesel back-up generators, unless absolutely necessary.

MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments on the Recirculated EIR, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed. MM-AQ-18 requires the use of only electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided and requires inclusion of this restriction in lease agreements. MM-AQ-20 also encourages tenants to become SmartWay partners, if eligible.

These emissions would continue to be reduced as the passenger car and truck fleets become increasingly electrified in future years, and as sales of GHG-emitting cars and trucks are phased out by 2035 in accordance with CARB's Advanced Clean Cars II regulations. Additionally, GHG emissions from Project buildings will continue to be reduced as California's electrical grid shifts to electrical generation sources that do not emit GHG in future years. (Appendix C-4 of the Final EIR)

March JPA has imposed all feasible mitigation measures on the Project that will reduce GHG impacts and will not impede the State's progress to carbon neutrality by 2045.

O-8.41 This comment claims that the Draft EIR did not summarize or evaluate the contribution of each proposed land use to the Project's overall mobile emissions and requests an additional alternative analysis that provides a detailed analysis of how proposing more office or other land use types than warehouses would address air quality impacts. As discussed in Recirculated Section 4.2, Air Quality, operational emissions were evaluated based on the land uses identified in the Specific Plan buildout

scenario, including area sources, energy use, mobile sources, TRU sources, on site equipment sources, and stationary sources.

As explained in Topical Response 8 – Alternatives, in response to comments, Alternative 5 – Non-Industrial Alternative has been included in the EIR alternatives analysis. Please see the full description and analysis of Alternative 5, which includes analysis of emissions associated with construction and operations and vehicle trips, including mobile source NOx emissions as referenced in the comment. As discussed in greater detail in the alternatives analysis, Alternative 5 would result in more criteria air quality pollutant emissions and fewer diesel particulate matter emissions during operations when compared to the Project, and air quality impacts would still be considered significant and unavoidable under Alternative 5. With regard to vehicle trips, Alternative 5 would substantially reduce truck trips but nearly double vehicle trips as compared to the proposed Project. Under Alternative 5, the shifts in land use to non-industrial uses would result in a corresponding increase in overall vehicle trip generation and an associated increase in VMT over the proposed Project. As such, Alternative 5 would result in greater VMT impacts and introduce a new significant impact when compared to the proposed Project.

O-8.42 As explained above, the EIR properly evaluated environmental impacts related to hazardous material, air quality, and GHG emissions. In response to comments, additional mitigation measures have been added to further reduce the Project's impacts. Please see Recirculated Section 4.2, Air Quality, for the added and expanded mitigation measures.

Responses to Appendices B-G

O-8.43 Appendix B to the comment letter is "Articles regarding impacts from growth of warehouse industry in California." These articles discuss warehouse development in the Inland Empire and environmental and other concerns that are not specific to the proposed Project. Specific comments regarding the Draft EIR are provided and responded to above and below. It is noted that Ramboll US Consulting, Inc., a leading environmental consulting firm, prepared technical comments on a report regarding the growth of warehouses in the Inland Empire and corresponding public health concerns. As detailed in the objective technical memorandum prepared by Ramboll's air quality and public health experts: previous and ongoing regulatory developments have achieved substantial reductions in air pollutant emissions from warehouse sources and will continue to improve air quality and public health across the South Coast Air Basin; siting distance issues have already been resolved by current and near-term regulatory programs; and commercial cargo will continue to move on Inland Empire freeways and roads, even if warehouses are located elsewhere, thus, the potential benefits of new warehouse development moratoria or delays may be overstated.[21] For example, as noted in the Ramboll memorandum, diesel particulate matter emissions from trucks operating in the Inland Empire region have decreased by 77 percent from 2016 to 2023.

O-8.44 Appendix C to the comment letter is "Map of Existing Warehouse Uses." As discussed in Response O-8.8 above, Appendix C is an aerial photograph with parcels outlined in blue, green, red, and orange that appears to depict warehouse buildings at various locations described in the corresponding comment as City of Riverside Sycamore Canyon; March JPA North Campus – Meridian; March JPA South Campus – Van Buren; Moreno Valley – Alessandro Boulevard and Cactus Avenue; and Perris,

[21] Ramboll US Consulting, Inc., *Technical Comments in Response to the December 2022 Report Titled A Region in Crisis: The Rationale for a Public Health State of Emergency in the Inland Empire*, February 2023.

Moreno Valley – Heacock and Mead Valley. These developments are already existing and therefore are included in the Project baseline conditions as appropriate for each impact area analyzed in the Draft EIR. Please refer to Response O-8.8.

O-8.45 Appendix D to the comment letter is "World Logistics Center Settlement Agreement." The Project's consistency with the air quality measures referenced in the comment is provided and responded to in Topical Response 2 – Air Quality. Please refer also to Responses O-8.20 and O.8-21 above.

O-8.46 Appendix E to the comment letter is "CenterPoint Properties Warehouse Project Conditions of Approval, approved May 2022." The Project's consistency with the air quality measures referenced in the comment is provided and responded to in Topical Response 2 – Air Quality. Please refer also to Response O.8-21 above.

O-8.47 Appendix F to the comment letter is "Mariposa Industrial Park Project Mitigation Monitoring and Reporting Program, approved December 2022." The Project's consistency with the air quality measures referenced in the comment is provided and responded to in Topical Response 2 – Air Quality. Please refer also to Response O.8-21 above.

O-8.48 Appendix G to the comment letter is "City of Fontana Ordinance 1891, mandatory measures for warehouse/fulfillment center projects." The Project's consistency with the air quality measures referenced in the comment is provided and responded to in Topical Response 2 – Air Quality. Please refer also to Response O-8.18 above.

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Comment Letter 0-9

From: Jonathan Montano <jonathan@mitchtsailaw.com>
Sent: Friday, March 10, 2023 9:52 AM
To: Dan Fairbanks
Cc: Mitchell M. Tsai Attorney at Law, P.C.; Mary Linares
Subject: SWMSRCC - March Joint Powers Authority - West Campus Upper Plateau - DEIR Comment Submission
Attachments: 20230308_SWMSRCC_MarchJPA_DEIR_Cmts_signed.pdf

Good morning,

Please find attached our comment letter submission for the DEIR - West Campus Upper Plateau project.

If you could please confirm receipt of the letter that would be appreciated.

0-9.1

Thank you,

--

Jonathan Montano
Paralegal
Mitchell M. Tsai, Attorney At Law
139 South Hudson Avenue Suite 200
Pasadena, CA 91101
Phone: (626) 314-3821
Fax: (626) 389-5414
Email: jonathan@mitchtsailaw.com
Website: http://www.mitchtsailaw.com

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P: (626) 314-3821
F: (626) 389-5414
E: info@mitchtsailaw.com

Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
Em: fairbanks@marchjpa.com

RE: March Joint Powers Authority, West Campus Upper Plateau, Draft EIR

Dear Mr. Fairbanks:

On behalf of the Southwest Mountain States Regional Council of Carpenters ("**Southwest Carpenters**" or "**SWMSRCC**"), my Office is submitting these comments to the March Joint Powers Authority addressing the Draft EIR ("**DEIR**") for the West Campus Upper Plateau Project ("**Project**").

SWMSRCC would like to express its support for this Project. After further reviewing this Project, SWMSRCC believes that the Project will benefit the environment and the local economy by practicing protocols that will protect worker health and safety and will incorporate adequate environmental mitigation.

Should the City have any questions or concerns, it should feel free to contact my office.

0-9.2

Sincerely,

Mary Linares, Esq.
Attorneys for Southwest Mountain States
Regional Council of Carpenters

Letter O-9

Southwest Carpenters
March 9, 2023

O-9.1 This comment references an attached letter and does not raise any issues or concerns about the analysis in the Draft EIR.

O-9.2 This comment expresses support for the Project and does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR.

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Comment Letter O-10

From:	Riverside Neighborhood Partnership <rivneighbors@gmail.com>
Sent:	Friday, March 10, 2023 2:56 PM
To:	Dan Fairbanks
Cc:	district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject:	Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments:	RNP letter on West Campus Upper Plateau .docx

Dear Mr. Fairbanks:

On behalf of the *Riverside Neighborhood Partnership*, I am writing to submit comments on the draft Environmental Impact Report for the proposed West Campus Upper Plateau. Our letter is attached below, with the Commission and other potentially interested parties included on this email.

O-10.1

Thank you for allowing us to provide comments on this project. We hope you will take the time to listen and consider the community's stance on this matter.

Sincerely,

Aram Ayra
Chairman/CEO
Riverside Neighborhood Partnership
www.rnpinfo.com



Mar 10, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

On behalf of the *Riverside Neighborhood Partnership*, I am writing to submit comments on the draft Environmental Impact Report for the proposed West Campus Upper Plateau. Serving as the Chairman of the Riverside Neighborhood Partnership, I have heard from neighbors of all 7 of our City Wards concerned about growing encroachment of warehouse and logistics centers both within our city and just outside of its borders. These large-scale distribution, logistics, and warehouse centers sacrifice long-term economic resiliency and environmental safety for short-term economic gains, without adequately benefiting the communities whose labor sustains them.

The West Campus Upper Plateau (the "Project") would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

0-10.2

As someone who devotes a good deal of my time working with and for the community, I value giving residents a voice in decisions that directly affect them. In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions**"** and **"**Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." I am one of thousands of people who have voiced opposition to the West Campus Upper Plateau as proposed over the past year. How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. If it does not, please explain your rationale for ignoring these policies from your General Plan for this project.

0-10.3

This Project conflicts with the interests of adjoining jurisdictions, specifically the adjacent residents. I have concerns that the development as proposed will do irreparable harm to surrounding communities in the following ways:

- Air quality impacts: We already have the worst air quality of any region of the United States. You have identified in your Draft Environmental Impact Report that there will be "significant and unavoidable" impacts to an area of the City and County that already bears an undue burden of pollution. Within a 5 km range of the proposed building site, there are already 45 million square feet of warehouses, generating over 30,000 truck trips, and spewing over 40 lbs of Diesel Particulate matter into the air daily.[1] This does not include the other proposed warehouses in the immediate vicinity, including the one at the Sycamore Canyon site, that have already been approved to be built. Given the effects that Diesel PM accounts for 70% of cancers attributable to toxic air contaminants[2], many local residents have expressed concerns for the health effects that this may have on them and their families.

0-10.4

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

  1) Your DEIR does not account for the 215/60 corridor, even though the freeway is within a mile of the site; and ostensibly, this is the route the trucks will use. The 215 is already overburdened with truck traffic, and our local infrastructure is paying the cost to our roads. Please consult with CalTrans and include the 215/60 corridor in your traffic analysis for the final EIR to reflect the reality of how our local area will be impacted.

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

0-10.5

- Job creation claims: I am grateful that the Inland Empire has one of the lowest unemployment rates in the state and the nation. However, I have concerns about an overinvestment in industrial development for a number of reasons.

0-10.6

[1] Numbers generated from Warehouse CITY tool: https://radicalresearch.shinyapps.io/WarehouseCITY/
[2] For more information, see California Air Resources Board website: https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts#footnote1_ljltley

According to the Southern California Association of Governments Economic Report (SCAG)[3] for December 2022:

"In 2001, GDP per capita in Riverside County and San Bernardino County were 64 percent and 69 percent of U.S. per capita GDP, respectively. When compared to the rest of California, the ratios are worse: 52 percent and 56 percent....Moreover, by 2022, **Riverside County's position had deteriorated to a per capita GDP of only 59 percent of the U.S. level and 40 percent of California**…. **These numbers are alarming, especially given the success of the Logistics Industry.** They imply that the impressive job growth in the Inland Empire since 2001 resulted in numerous jobs, but they tend to be relatively lower paying jobs compared to other parts of the state and nation. This explains, in part, why such a large number of workers prefer to commute into the coastal areas, despite the heavy cost involved in terms of time lost on the road. It also explains why the **Inland Empire's per capita GDP has sunk to a rank of 340 out of 386 MSAs,** despite being the twelfth largest by population count." (emphasis added)

In other words, in spite of our low unemployment rate, our economic outlook is worse than it was prior to the explosion of the logistics industry. In that same SCAG report, they discuss how the logistics industry "will likely go through a transformation as advances in automation and artificial intelligence displace workers." It warns: "There will be further costs from the expansion of the Logistics Sector if the result of the expansion means that **there will be less industrial space available in the future for industries which are able to add more value to the economy per square foot.**" (emphasis added)

Furthermore, the vast majority of companies purchasing warehouses are not from the local area and are mostly from Orange County or outside California. 80% of the warehouses in Riverside County are owned by businesses with mailing addresses outside the region. For instance, more warehouse square footage in the Inland Empire is owned by businesses in Dallas, TX and Denver, CO than Riverside.[4] So, we pay the costs of goods moving through Riverside County in terms of air quality and traffic, but the wealth from this industry is not benefitting our local economy.

O-10.6 Cont.

We need to think long and hard about land use if our goal is long-term economic growth. Considering the significant and unavoidable impacts and the minimal economic benefit created by the proposed development, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. Please encourage the developer to consider non-industrial, alternative uses of the land for the sake of those living adjacent to the site as well as the economic future of our region.

O-10.7

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,

[3] SCAG Report can be found at: https://scag.ca.gov/sites/main/files/file-attachments/briefing_book_2022_final.pdf?1669774904

[4] Data from the Assessor Recorder Office Riverside County: https://gis2.rivco.org/

Aram Ayra
Chairman/CEO
Riverside Neighborhood Partnership

Contact:
rivneighbors@gmail.com
360 Glenhill Dr.
Riverside, CA 92507
(951) 384-1227

Letter 0-10

Riverside Neighborhood Partnership
March 10, 2023

0-10.1 This comment references an attached letter and does not raise any specific comments or questions on the Draft EIR. As such, no further response is provided.

0-10.2 This comment is introductory in nature and does not raise any specific comments or questions on the Draft EIR. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a maximum buildout of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

0-10.3 This comment questions the Draft EIR's consistency determination with regard to March JPA General Plan Policies 2.3 and 2.4 given the Project's significant and unavoidable noise and air quality impacts. Please note that CEQA Guidelines Section 15125(d) requires EIRs to discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans. However, an inconsistency does not necessarily mean a potentially significant conflict under CEQA. Threshold LU-1 asks: Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? So, unless (1) the applicable plan, policy or regulation was "adopted for the purpose of avoiding or mitigating an environmental effect" and (2) the conflict would cause a significant environmental impact, any inconsistency would not be a potentially significant conflict under CEQA. Inconsistency with policies that do not avoid or mitigate an environmental effect would not be considered potentially significant under CEQA. General Plan Policies 2.3 (Support land uses that provide a balanced land use pattern of the Planning Area, and discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions) and 2.4 (Protect the interests of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses) do not avoid or mitigate an environmental effect so any inconsistency would not be considered potentially significant under CEQA. Further, as discussed in the Recirculated Section 4.10, Land Use and Planning, the Project is consistent with the Good Neighbor Guidelines for the County of Riverside. Topical Response 4 – Project Consistency includes a discussion of the Project's consistency with the City of Riverside Good Neighbor Guidelines. The purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses.

The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. The comment incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary,

the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

With respect to noise impacts, as disclosed in Section 4.11, Noise, the Project would not generate substantial temporary or permanent increases in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Segment 13, which passes through industrial development and is a non-sensitive receiving land use, meaning that there are no nearby sensitive receptors, including residential uses. As such, this impact, while significant and unavoidable, would not impact any residential or other sensitive uses in the vicinity of the Project. All Project noise impacts to residential uses would be less than significant.

With regard to air quality impacts, the air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Please see Recirculated Section 4.2, Air Quality, for the revised air quality mitigation measures. Please see Topical Response 2 – Air Quality for a discussion of the Project's consistency with the following:

- Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act – Office of the California Attorney General, September 2022
- SCAQMD 2022 Air Quality Management Plan
- U.S. EPA – Mobile Source Pollution: Environmental Justice and Transportation
- World Logistics Center Settlement Agreement Air Quality Measures
- Centerpoint Properties Air Quality Conditions of Approval
- City of Fontana Ordinance 1891 Air Quality Measures

O-10.4 This comment states that the region has the worst air quality of any region of the United States, and that there are a large number of warehouses located within a 5 km range of the Project site. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR) and shown on Exhibit 2-A of the Revised Project Air Quality Impact Analysis (Appendix C-1), despite a significant increase in vehicle miles traveled, gross state product, and population, the cancer risk associated with diesel particulate matter emissions has decreased since 1990. In addition, SCAQMD has conducted an in-depth periodic analysis of TACs and their resulting health risks throughout the air basin. This study, the *Multiple Air Toxics Exposure Study in the South Coast Air Basin*, shows that cancer risk has decreased by approximately 83% between MATES II (1998) and MATES V (2018) at the nearest monitored location to the Project site. As the region and state continue to implement increasingly stringent emission controls and the electrification of truck fleets continues, it is anticipated that this trend would continue.

This comment questions why the Sycamore Canyon site and other proposed warehouses in the immediate vicinity of the Project site were not included in the analysis. Table 4-2 of the Draft EIR lists the cumulative projects included in the environmental analysis. The Sycamore Hills Distribution Center, north of the Project site and adjacent to Sycamore Canyon, is included.

The comment further raises concerns regarding health impacts due to DPM. Recirculated Section 4.2, Air Quality, and Appendix C-2 assess the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR) located 32 feet from construction activities,), the

maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts identified in the Draft EIR.

0-10.5 This comment states that the Draft EIR has deficiencies in the traffic analysis because the Draft EIR does not account for the 215/60 corridor and because truck drivers do not follow agreed upon routes. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), March JPA has adopted its own guidelines for traffic analysis: the March JPA Traffic Impact Study Guidelines, dated February 10, 2020 (March JPA Guidelines). Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. As such, to comply with CEQA, Caltrans does not utilize peak hour intersection operations analysis and instead utilizes VMT in compliance with SB 743 through its VMT-Focused Transportation Impact Study Guide (Caltrans VMT Guide), dated May 20, 2020. The March JPA Guidelines were adopted before the Caltrans VMT Guide and therefore the reference is now-superseded Caltrans guidance. The Project VMT Analysis (Appendix N-1) was prepared in compliance with the Caltrans VMT Guide and meets the current transportation analysis requirement for Caltrans. Caltrans was notified about the Project through the release of the Notice of Preparation on November 18, 2021. Caltrans also received the Notice of Availability for the Draft EIR when the

document was circulated for public review beginning on January 9, 2023. No comments were provided by Caltrans during the scoping period or public review for the Project.

Pursuant to Caltrans safety requirements, the Project Traffic Analysis (Appendix N-2) included an assessment of the I-215 off-ramps at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard to ensure there is no queuing, or back-up, onto the freeway mainline. These I-215 off-ramps were selected because the Project is anticipated to contribute 50 or more peak hour trips to these off-ramp intersections, consistent with the March JPA Guidelines. The Project Traffic Analysis (Appendix N-2) performed a queuing analysis for these I-215 Freeway off-ramps for all scenarios (Existing [2021], Existing plus Project, Existing plus Ambient Growth plus Project, Opening Year [2028] Cumulative Without Project, Opening Year [2028] With Project, Horizon Year [2045] Without Project, and Horizon Year [2045] With Project). Based on the results of this queuing analysis, there are no study area off-ramps that are anticipated to experience queuing issues under any scenario. Caltrans is one of the state reviewing agencies for the Project, and had the opportunity to comment on the transportation analysis. https://ceqanet.opr.ca.gov/2021110304. Caltrans did not submit any comments on this Project.

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

The comment also raises concerns about enforcement and maintenance. In response to truck route enforcement concerns, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As has been the case with other areas in the Meridian Business Park, as the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already

part of the Project, they are also separate conditions of approval and also included in the MMRP. March JPA will monitor compliance through the MMRP. Regarding maintenance concerns, commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[22]

O-10.6 This comment questions the number of jobs and unemployment rates in the Inland Empire region and questions the economic viability of additional logistics industry development. The comment also raises questions about gross domestic product, salary, and out of county ownership, none of which are related to environmental impacts or CEQA. In response to questions about the employment numbers associated with the proposed Project, please see Topical Response 5 - Jobs. The comment also raises concerns regarding automation. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

O-10.7 This comment expresses general opposition to the proposed Project. The comment further requests a non-industrial alternative. In response to this comment, please see Topical Response 8 - Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

[22] https://www.dmv.ca.gov/portal/dmv-research-reports/department-of-motor-vehicles-dmv-performance-reports/where-did-your-2020-fees-go/

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9.4 Form Letter Responses to Comments

9.4.1 Form Letter A Responses to Comments

Comment Letter	Name	Date
Individuals		
I-79	John Viafora	2/21/2023
I-90	Frank Erdodi	2/21/2023
I-91	Frank Erdodi	2/21/2023
I-95	Melissa Suarez	2/21/2023
I-104	Kristy Doty	2/22/2023
I-116	Mark Calhoun	2/22/2023
I-124	DJ Weems	2/22/2023
I-128	David Doty	2/23/2023
I-145	Crystal McCreary	2/24/2023
I-147	Natalie Gravitt	2/24/2023
I-151	Nicolette Rohr	2/24/2023
I-152	Ana Ramirez	2/25/2023
I-185	Benjamin Fernandez	2/27/2023
I-187	Christian Clark	2/27/2023
I-202	chrisr3685@yahoo.com	2/27/2023
I-218	Eunhee Kim	2/27/2023
I-226	Fernando Sosa Jr.	2/27/2023
I-236	Joseph Aklufi	2/27/2023
I-241	Janet Oien	2/27/2023
I-254	Josie Sosa	2/27/2023
I-265	Kathleen Jump	2/27/2023
I-272	Suzanee Page	2/27/2023
I-280	Michael Dearman	2/27/2023
I-283	Maria Rodriguez	2/27/2023
I-291	Q'Vinc Asberry	2/27/2023
I-301	Richard Arvizu	2/27/2023
I-303	Roger Reaney	2/27/2023
I-308	Sean Walsh	2/27/2023
I-314	Tony Harkness	2/27/2023
I-326	amaharris12@gmail.com	2/28/2023
I-334	Ann & Dolores Marchand	2/28/2023
I-343	Jennifer Zamora	2/28/2023
I-350	Karen Bartell	2/28/2023
I-361	Luis Rodriguez	2/28/2023
I-363	Nicole Bernas	2/28/2023
I-385	Drew Ward	2/28/2023
I-400	Bobby Robinette	3/1/2023
I-407	Cynthia Spring-Pearson	3/1/2023
I-411	Kristine Doty	3/1/2023
I-419	Maria Estabrooks	3/1/2023

Comment Letter	Name	Date
Individuals		
I-429	Senanu Spring-Pearson	3/1/2023
I-458	Peter Pettis	3/2/2023
I-466	Aaron Bushong	3/3/2023
I-475	Annabelle Porter	3/3/2023
I-478	Chris Shearer	3/4/2023
I-487	Don Morris	3/4/2023
I-515	Elise Estrella-Hahn	3/5/2023
I-525	Greg Russell	3/5/2023
I-540	Joe Aklufi	3/5/2023
I-547	Robert Creed	3/5/2023
I-554	Ryan Joseph	3/5/2023
I-566	Tia Ballesteros	3/5/2023
I-575	Beverly Arias	3/6/2023
I-585	Felix & Felicia Valencia	3/6/2023
I-586	Felix & Felicia Valencia	3/6/2023
I-607	Jenna Pontious	3/7/2023
I-625	Michele Muehls	3/7/2023
I-634	Michelle Singleton	3/7/2023
I-642	Rosario Garcia	3/7/2023
I-643	Richard Stalder	3/7/2023
I-650	Stephanie Jimenez	3/7/2023
I-652	Tom Parkinson	3/7/2023
I-663	Kristy Doty	3/8/2023
I-664	Kristy Doty	3/8/2023
I-692	Abigail Banning	3/9/2023
I-701	Amber Peaslee	3/9/2023
I-714	Allison Bushong	3/9/2023
I-732	Cynthia Jessen	3/9/2023
I-736	Christine Martin	3/9/2023
I-741	Clay Muehls	3/9/2023
I-754	David Doty	3/9/2023
I-766	Freddie Quintana	3/9/2023
I-805	Leslie Bushong	3/9/2023
I-815	Linda TinglyRivera	3/9/2023
I-826	Mark Jessen	3/9/2023
I-840	Milo Rivera	3/9/2023
I-856	Ronald Peters	3/9/2023
I-858	Rita Schneider	3/9/2023
I-865	Sally Quintana	3/9/2023
I-874	Tim Martin	3/9/2023
I-887	Abdallah Karim	3/10/2023
I-904	Cindy Chiek	3/10/2023
I-923	Kyle Warsinski	3/10/2023
I-929	Magie Lacambra	3/10/2023
I-942	Pete Elliot	3/10/2023

Comment Letter	Name	Date
Individuals		
I-951	Rosamonde Cook, Ph.D.	3/10/2023
I-965	Veronica Juarez	3/10/2023

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Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. FL-A.1

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. FL-A.2 FL-A.3

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? FL-A.4 FL-A.5 FL-A6. FL-A.7 FL-A.8

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. FL-A.9 FL-A.10

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents. FL-A.11

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the FL-A.12

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

FL-A.12 Cont.

FL-A.13

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

FL-A.14

Form Letter A Response

The following response is provided to address comments raised in "Form Letter A," which primarily focuses on aesthetic impacts of the proposed Project.

FL-A.1 This comment is a brief summary of the proposed Project. No comments, questions or concerns about the environmental analysis included in the Draft EIR are raised. As such, no further response is provided.

FL-A.2 This comment refers to the Project's various zoning designations and suggests that a majority of the development will be warehouses. The Project proposes the following mix of land uses on corresponding acreages, as indicated in Table 1-1 of the Draft EIR:

- Business Park – 65.32 acres
- Industrial – 143.31 acres
- Mixed Use – 42.22 acres
- Public Facility – 2.84 acres
- Parks/Recreation/Open Space – 78.00 acres
- Streets – 37.91 acres
- Existing Public Facility – 2.87 acres
- Open Space/Conservation Easement – 445.43 acres

For purposes of analysis, the Draft EIR assumed the following buildout scenario:

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1, 280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facility – 2.84 acres for future sewer lift station and electrical substation (within the Specific Plan Area)

As detailed in Table 3-2, Land Uses by Land Use Designation, in Recirculated Chapter 3, Project Description, the Industrial, Business Park, and Mixed Use land use designations permit a wide range of uses, including manufacturing, storage and distribution, office, and commercial uses. The only plot plans proposed as part of the Project are for Buildings B and C on industrial-zoned parcels; no specific development is proposed on the remaining parcels within the Campus Development. As such, through the evaluation of the buildout scenario, the Draft EIR discloses the impacts of the Specific Plan at the maximum foreseeable level, which includes warehousing as it is one of the more intensive uses allowed under the Specific Plan.

FL-A.3 This comment questions the relevancy of Appendix B to the Draft EIR and notes that Table 1-2 on page 1-17 of the Draft EIR summarizes the impacts of the Project, including aesthetic impacts. Appendix B of the Draft EIR includes the Project Sight Line Sections, Conceptual Grading Plans and the Photometric Plans for the proposed Park. Section 4.1, Aesthetics, and Meridian Upper Plateau Sight Line Sections

(included within Appendix B of the EIR), describe sight line sections that show existing and proposed grades at five sections through the Project site in order to match the locations of the viewpoints evaluated in this EIR. These sections were prepared to visually demonstrate the finished grade for the Project, to help viewers understand the future elevation of the Specific Plan Area and Conservation Easement when viewed from neighboring off-site residential areas. Accordingly, they show the topography of the Project at these locations under existing and proposed conditions. Appendix B also includes the photometric lighting analysis for field lighting that would be included in the Park component of the Project. Appendix B supports the analysis of the Specific Plan buildout scenario included in Section 4.1, Aesthetics, of the Draft EIR. Regarding Table 1-2, no specific comments, questions, or concerns about the environmental analysis included in the Draft EIR are raised. As such, no further response is provided.

FL-A.4 This comment suggests that the threshold of significance used in the Draft EIR to evaluate the Project's aesthetic impacts is arbitrary. To the contrary, the aesthetics analysis in the EIR is based on established thresholds. Specifically, as explained in Section 4.1.4, Thresholds of Significance, the significance criteria used to evaluate the Project impacts related to aesthetics are based on the thresholds contained in Form J of the 2022 March JPA CEQA Guidelines, which mirror the thresholds in Appendix G of the CEQA Guidelines. The discretion to choose the applicable threshold rests with the lead agency – in this case, March JPA. CEQA Guidelines Section 15064(b) confirms that lead agencies may exercise their discretion on what criteria to use , and it provides that "[t]he determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data."

FL-A.5 This comment questions the Draft EIR's conclusion that the Project's aesthetic impacts would be less than significant. See Topical Response 1 – Aesthetics for an explanation of the Project's aesthetic impacts and March JPA's application of the thresholds of significance.

The comment also questions whether March JPA will "simply take the developer's word" that impacts to aesthetics are less than significant. The EIR represents March JPA's independent judgment regarding the Project's impacts, as well as the thresholds of significance used. This is consistent with CEQA Guidelines Section 15084(e), which provides that "[t]he draft EIR which is sent out for public review must reflect the independent judgment of the lead agency. The lead agency is responsible for the adequacy and objectivity of the draft EIR."

FL-A.6 This comment discusses perceptions of visual change from residents who live near the Project site or who frequent Orange Terrace Park or The Grove. As discussed in Topical Response 1 – Aesthetics, and Section 4.1, Aesthetics, of the Draft EIR, five viewpoints were used to evaluate the Project's impacts in relation to scenic vistas and existing visual character and quality of public views of the Project site and its surroundings. As shown in Figure 4.1-2, Key Points Viewpoint Map, the selected viewpoints also provide representative views likely to be experienced by residents. Viewpoint No. 3, as shown in Figure 4.1-5, is located near the intersection of Barton Street and Grove Community Drive, approximately 250 feet south of the Project site and best represents the public views from Orange Terrace Park and The Grove Community Church. The viewpoint provides an elevated northeasterly view towards the Project site. Viewpoint No. 3 is representative of views towards the Project site available to motorists and pedestrians along Grove Community Drive. This viewpoint is taken from elevation 1,722 feet above mean sea level (AMSL). Under existing conditions, this viewpoint offers distant views of the locally prominent foothills of the San Bernardino Mountain Range to the

north in the background. The viewpoint also offers views of the Grove Community Church in the foreground and previously disturbed dirt roads, electrical poles, and the former munitions bunkers in the background. The existing gradient from northernmost point of Barton Drive, adjacent to the Grove Community Church to the Specific Plan Area is shown along Section P on the site section plan (Appendix B). This point, along Section P, is approximately 0.22 miles north of Viewpoint No. 3, in line with the Project site and Viewpoint No. 3. The existing grade is shown to have an approximately 8-foot incline from the northernmost point of Barton Drive, across the 300-foot Conservation Easement, to the edge of the proposed Specific Plan Area.

As discussed in Topical Response 1 – Aesthetics, to provide additional clarification regarding the potential visual impacts of the Project buildout scenario, additional discussion regarding Viewpoint No. 3 has been added to the aesthetics analysis under Threshold AES-2 in Section 4.1, Aesthetics, of the Final EIR. As explained therein, while the existing visual character would change from Viewpoint No. 3, setbacks, the Conservation Easement, compliance with PDF-AES-1, and landscaping would soften the changes in the view by partially screening Campus Development and retaining views of vegetation and the San Bernardino Mountain foothills. This additional discussion does not affect the conclusions in the Draft EIR, and impacts would remain less than significant.

This comment further describes the applied thresholds of significance for aesthetics used in the Draft EIR as "impossibly low." As explained in Section 4.1.4, Thresholds of Significance, of the Draft EIR, the significance criteria used to evaluate the Project aesthetics impacts are based on the 2022 March JPA CEQA Guidelines. The aesthetics thresholds identified in Form J of the 2022 March JPA CEQA Guidelines are identical to the aesthetics thresholds in Appendix G of the CEQA Guidelines. Section 4.1, Aesthetics, evaluated whether the Project would "have a substantial adverse effect on a scenic vista," "substantially degrade the existing visual character or quality of public views of the site and its surroundings," or "create a new source of substantial light or glare which would adversely affect day or nighttime views in the area." As discussed in Response FL-A.4, above, the discretion to choose the applicable threshold rests with the lead agency – in this case, March JPA. March JPA has determined these thresholds are appropriate for evaluating the Project's aesthetic impacts.

FL-A.7 This comment requests "an alternate plan that truly considers aesthetics from the point of view of the people who live" in the Project vicinity. As noted in Response FL-A.6 above, the five viewpoints used in the Draft EIR, which were selected based on professional experience in conducting visual analyses, also provide representative views likely to be experienced by residents. The alternatives presented in Chapter 6, Alternatives, of the Draft EIR, have all been evaluated for potential aesthetic impacts. Similar to the analysis included in Section 4.1, Aesthetics, consideration of visual changes to publicly available views of the Project site were considered. Additionally, see Topical Response 8 – Alternatives, within which a new Alternative 5 – Non-Industrial Alternative, is presented and its aesthetic impacts are evaluated.

FL-A.8 This comment requests an alternative that does not include warehouses or industrial development. See Topical Response 8 – Alternatives, within which a new Alternative 5 – Non-Industrial Alternative, is presented and evaluated.

FL-A.9 This comment questions the presentation of the buildings depicted in the visual simulations as different from existing buildings within the March JPA Planning Area. Since development within the Project site would have to comply with the standards of the proposed Specific Plan, the photosimulations, as shown in Figures 4.1-3 through 4.1-7, in the Draft EIR to evaluate the Project's aesthetic impacts apply the

proposed Specific Plan's standards. The height and sizing of the buildings in the photosimulations conform to the standards in Chapter 3, Development Regulations, of the proposed Specific Plan. The color and plant palettes utilized in the visual simulations prepared for the proposed Project conform with the standards in Chapter 4, Design Guidelines and Standards, of the Specific Plan.

FL-A.10 This comment questions the size, appearance, and number of buildings shown in the photosimulations. Figure 4.1-3, Viewpoint No. 1, depicted buildings with a maximum height of 50 feet instead of 45 feet, and utilized an older version of the site plan with four Business Park parcels on the northern portion of the Specific Plan Area instead of the current proposed configuration of seven Business Park parcels. In response to this comment, Figure 4.1-3, Viewpoint No. 1 Photosimulation, has been revised to reflect the reduced maximum building height and development of seven Business Park parcels instead of four and included in Section 4.1, Aesthetics, of this Final EIR.

The revisions to Figure 4.1-3 do not constitute significant new information. The analysis in the DEIR was based on the current site plan; only Figure 4.1-3 was based on an outdated site plan. As such, the revisions to Figure 4.1-3 in the EIR do not change the analysis or conclusions in the Draft EIR related to aesthetics, and impacts would remain less than significant. This revision merely reflects the reduction in building heights by 5 feet and provides a more accurate spatial relationship between building setbacks due to a change in the site plan. Moreover, the reduction in height and massing would reduce the visual impacts of the buildings. As such, and as noted above, these revisions do not constitute significant new information added to the EIR such that recirculation of the EIR under CEQA Guidelines Section 15088.5 would be required.

This comment further requests the photosimulations use 'the actual appearance of warehouses in the area." In response, please see Response to Comment FL-A.9, above.

FL-A.11 This comment states that construction of warehouses, odors from diesel trucks, and the significant and unavoidable noise impacts will negatively impact the daily lives of residents. With respect to odors, Threshold AQ-4 in Recirculated Section 4.2, Air Quality, found that potential odor impacts of the Project would be less than significant. In addition, the Project contains MM-AQ-16, which requires signage with contact information for the tenant representative, March JPA, County of Riverside, and SCAQMD for complaints about excessive noise, dust, fumes, odors, and perceived Code violations.

With respect to noise impacts, as disclosed in Section 4.11, Noise, of the Draft EIR, the Project would not generate substantial temporary or permanent increases in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Segment 13, passes through industrial development and is a non-sensitive receiving land use, meaning that there are no nearby sensitive receptors, including residential uses. As such, this impact, while disclosed as significant and unavoidable, would not impact any residential or other sensitive uses in the vicinity of the Project. All potential Project noise impacts to residential uses were determined in the Draft EIR to be less than significant.

Lastly, this comment raises concerns regarding construction of warehouses within "a beautiful passive recreation area." The Project consists of two components: the Specific Plan Area and the Conservation Easement. The approximately 370-acre Specific Plan Area includes the remnants of the March AFB Weapons Storage Area, March JPA property which has consistently been fenced off to prevent public access. The remainder of the Project site will be preserved in the approximately 445-acre

Conservation Easement, which includes the trails the public has accessed for passive recreation purposes. The public's utilization of this area for passive recreation is subject to the discretion and authorization of March JPA, as noted in Chapter 4.0, Environmental Analysis, of the Draft EIR. As detailed throughout the Draft EIR, there is no development proposed within the Conservation Easement and no physical alteration is anticipated.

FL-A.12 This comment expresses concerns that the Project is inconsistent with the March JPA General Plan as it relates to public benefit. Please see Recirculated Section 4.10, Land Use and Planning, for a consistency analysis of the Project with the relevant March JPA General Plan goals and policies. Public benefits provided by the Project would include increased job opportunities for local residents, preservation of open space, extension of the roadway infrastructure and the pedestrian and bicycle circulation system, a new approximately 60-acre public park, and construction of the Meridian Fire Station, at the intersection of Opportunity Way and Meridian Parkway (see Topical Response 6 - Fire Station, for additional details). The Project is consistent with the March JPA General Plan and provides public benefits.

FL-A.13 This comment summarizes the concerns regarding aesthetics, jobs creation, and impacts to recreational areas. As examined in Section 4.1, Aesthetics, of the Draft EIR, Topical Response 1 – Aesthetics, and Responses FL-A.2 through FL-A-15, the EIR disclosed the Project's aesthetic impacts, applied an appropriate threshold of significance based on the 2022 March JPA CEQA Guidelines, and determined the Project's impacts to be less than significant with implementation of PDF-AES-1 through PDF-AES-16 and MM-AES-1 through MM-AES-3. See Response FL-A.12, above, for an overview of the Project's public benefits. See Response FL-A.11, above, regarding the continuation of the Conservation Easement for passive recreation.

FL-A.14 This This comment states that March JPA and the Applicant have a duty to adhere to the March ARB General Plan and engage the local communities and municipalities. First, the March Air Reserve Base does not have an adopted General Plan. Second, the Project's consistency with the March JPA General Plan is discussed, as it pertains to policies that were adopted for the purpose of avoiding or mitigating an environmental impact in Recirculated Section 4.10, Land Use and Planning. March JPA and the Applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation. Using a radius of 1,200 feet around the perimeter of the Project site, March JPA distributed 2,172 public notices. March JPA engaged with local jurisdictions and service providers (see, e.g., the traffic scoping agreement in Appendix N-2).

FL-A.15 This comment summarizes previously stated concerns regarding aesthetics impacts and alternatives. CEQA Guidelines Section 15126.6(f) provides that "[t]he range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project." As examined in Section 4.1, Aesthetics, of the Draft EIR, Topical Response 1 – Aesthetics, and Responses FL-A.2 through FL-A-15, the EIR has disclosed the Project's aesthetic impacts, applied an appropriate threshold of significance based on 2022 March JPA CEQA Guidelines, and determined the Project's impacts to be less than significant with implementation of PDF-AES-1 through PDF-AES-16 and MM-AES-1 through MM-AES-3. As such, the reduction of

aesthetic impacts would not be required to be considered in the selection of a reasonable range of alternatives to the Project. The alternatives presented in Chapter 6, Alternatives, of the Draft EIR, have all been evaluated for potential aesthetic impacts. Similar to the analysis included in Section 4.1, Aesthetics, consideration of visual changes to publicly available views of the Project site were considered. Alternative 2 (Reduced Development) and Alternative 4 (Reduced Cultural Resource Impact) were determined to have reduced aesthetics impacts compared to the Project. Topical Response 8 – Alternatives, presents and analyzes a new Alternative 5 – Non-Industrial Alternative, determining its aesthetic impacts would be reduced compared to the Project's.

9.4.2 Form Letter B Responses to Comments

Comment Letter	Name	Date
Individuals		
I-73	Matt Silveous	2/23/2023
I-75	Karrie Brusselback	2/21/2023
I-78	John Viafora	2/21/2023
I-88	Erin Lehman	2/21/2023
I-89	Erin Lehman	2/21/2023
I-100	David Doty	2/22/2023
I-106	Kristy Doty	2/22/2023
I-109	Kristine Doty	2/22/2023
I-111	Mark Calhoun	2/22/2023
I-117	Beth West	2/22/2023
I-119	DJ Weems	2/22/2023
I-131	K Doty	2/23/2023
I-134	Richard Stadler	2/23/2023
I-138	Crystal McCreary	2/24/2023
I-149	Nicolette Rohr	2/24/2023
I-156	Ana Ramirez	2/25/2023
I-181	Benjamin Fernandez	2/27/2023
I-186	Brian Wardle	2/27/2023
I-193	Chad Smith	2/27/2023
I-197	chrisr3685@yahoo.com	2/27/2023
I-210	Denette Lemons	2/27/2023
I-216	Eunhee Kim	2/27/2023
I-222	Fernando Sosa Jr.	2/27/2023
I-232	Joseph Aklufi	2/27/2023
I-245	Janet Oien	2/27/2023
I-250	Josie Sosa	2/27/2023
I-261	Kathleen Jump	2/27/2023
I-268	Suzanee Page	2/27/2023
I-277	Michael Dearman	2/27/2023
I-281	Maria Rodriguez	2/27/2023
I-288	Q'Vinc Asberry	2/27/2023
I-297	Richard Arvizu	2/27/2023
I-312	Tony Harkness	2/27/2023
I-330	Ann and Dolores Marchand	2/28/2023
I-336	Jennifer Zamora	2/28/2023
I-339	Jennifer Zamora	2/28/2023
I-346	Karen Bartell	2/28/2023
I-354	Kevin Heinemann	2/28/2023
I-357	Luis Rodriguez	2/28/2023
I-366	Rachel Lathan	2/28/2023
I-378	Drew Ward	2/28/2023
I-381	Drew Ward	2/28/2023
I-389	Francine Carbajal	2/28/2023

Comment Letter	Name	Date
Individuals		
I-393	Alejandra Joseph	3/1/2023
I-396	Bobby Robinette	3/1/2023
I-403	Cynthia Spring-Pearson	3/1/2023
I-410	Julie Weatherford	3/1/2023
I-423	Maria Estabrooks	3/1/2023
I-426	Remedios Santos	3/1/2023
I-432	Senanu Spring-Pearson	3/1/2023
I-454	Peter Pettis	3/2/2023
I-464	Aaron Bushong	3/3/2023
I-471	Annabelle Porter	3/3/2023
I-482	Don Morris	3/4/2023
I-492	Amy Litt	3/5/2023
I-495	Barbara Kerr	3/5/2023
I-496	Ben Murphy	3/5/2023
I-498	Christopher Gate	3/5/2023
I-511	Elise Estrella-Hahn	3/5/2023
I-519	George Harvilla	3/5/2023
I-536	Joe Aklufi	3/5/2023
I-551	Ryan Joseph	3/5/2023
I-557	Sara Amend	3/5/2023
I-561	Tia Ballesteros	3/5/2023
I-571	Beverly Arias	3/6/2023
I-582	Felix and Felicia Valencia	3/6/2023
I-591	Leo Bobadilla	3/6/2023
I-603	Gayle DiCarlantonio	3/7/2023
I-621	Michele Muehls	3/7/2023
I-627	Milo Rivera	3/7/2023
I-630	Michelle Singleton	3/7/2023
I-639	Rosario Garcia	3/7/2023
I-646	Stephanie Jimenez	3/7/2023
I-651	Tim Martin	3/7/2023
I-657	Greg Garnier	3/8/2023
I-668	Lenora Mitchell	3/8/2023
I-669	Linda Tingly	3/8/2023
I-671	Linda Tingly	3/8/2023
I-681	Yueqiu Zhou	3/8/2023
I-688	Abigail Banning	3/9/2023
I-697	Amber Peaslee	3/9/2023
I-712	Allison Bushong	3/9/2023
I-728	Cynthia Jessen	3/9/2023
I-739	Clay Muehls	3/9/2023
I-750	David Doty	3/9/2023
I-769	Freddie Quintana	3/9/2023
I-803	Leslie Bushong	3/9/2023
I-816	Linda TinglyRivera	3/9/2023

Comment Letter	Name	Date
Individuals		
I-821	Mark Jessen	3/9/2023
I-852	Ronald Peters	3/9/2023
I-859	Rita Schneider	3/9/2023
I-868	Sally Quintana	3/9/2023
I-876	Tom Schneider	3/9/2023
I-882	Abdallah Karim	3/10/2023
I-901	Betty A. Anderson	3/10/2023
I-902	Brian Wardle	3/10/2023
I-905	Cindy Chiek	3/10/2023
I-928	Magie Lacambra	3/10/2023
I-935	Nicole Bernas	3/10/2023
I-939	Pete Elliot	3/10/2023
I-952	Rosamonde Cook, Ph.D.	3/10/2023
I-961	Veronica Juarez	3/10/2023

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Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. FL-B.1 FL-B.2 FL-B.3

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. FL-B.4

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. FL-B.5 FL-B.6 FL-B.7

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site? FL-B.8

We would ask for significant mitigations to be put in place to reduce the impacts on local residents. FL-B.9
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing. FL-B.10

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant FL-B.11

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

FL-B.11 Cont.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

FL-B.12

Form Letter B Response – Air Quality

FL-B.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

FL-B.2 This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required.

FL-B.3 This comment requests a non-industrial alternative to the Project. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated.

FL-B.4 This comment acknowledges the Draft EIR's determination of significant and unavoidable air quality impacts and generally claims there are deficiencies in the analysis. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR. More specific issues are addressed in responses below.

FL-B.5 This comment raises concerns regarding cumulative impacts of adjacent industrial developments. In response, please see Recirculated Section 4.2, Air Quality, for an expanded discussion of cumulative health risks. The World Logistics Center and Stoneridge Commerce Center are both located more than 10 miles away from the Project site. As explained in Recirculated Section 4.2, Air Quality, in terms of regional air quality emissions, the South Coast Air Quality Management District (SCAQMD) daily operational thresholds for project-specific impacts used by March JPA represent the level above which emissions would be considered cumulatively significant and were developed based on regional air quality in the SCAB. Because of this, all development, including the warehouses mentioned in the comment, were accounted for in the analysis. While SCAQMD does not provide specific guidance for evaluating cumulative health risk impacts beyond the use of the incremental cancer risk threshold of 10 in one million on an individual project basis, the Bay Area Air Quality Management District utilizes a 1,000-foot zone of influence approach for evaluating cumulative health risk impacts and a threshold of 100 in one million that is supported by the EPA.[1] March JPA therefore used this methodology that was approved by an expert air district to respond to comments related to cumulative health impacts. The analysis in the EIR demonstrates that Project emissions would not result in a significant cumulative health impact.

FL-B.6 This comment questions the analysis regarding Transport Refrigeration Units (TRUs). As explained in Recirculated Section 4.2, Air Quality and Appendices C-1 and C-2, the analysis conservatively accounted for TRU emissions that would occur during on- and off-site travel, as well as at loading docks. Under unmitigated conditions, the analysis conservatively assumed that each TRU would idle on- site

[1] https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en.

for approximately 2.1 hours and, under mitigated conditions, each TRU would idle for 30 minutes while on-site but not at the loading dock. However, the emissions and risk presented in the analysis represents a worst-case scenario in which improvements in technology and emissions standards are not realized, which identifies a static Year 2028 emission factor year being utilized. Under the 2022 amendments to the TRU Airborne Toxic Control Measures, CARB requires that fleets steadily turn over their TRUs to zero-emission units, with the turnover to zero-emission TRUs required by 2029. Given that the analysis assumed that emission factors would remain constant based on a 2028 opening year, incorporation of the 2022 amendments would result in long-term risk lower than what is reported in the analysis. However, these emissions are accounted for in the air quality, GHG, and health risk assessment studies, which consider emissions from TRUs that would occur while operating at loading docks, traveling on the site, as well as on surrounding roadways docks. Emissions were calculated using the latest emission factors obtained from EMFAC 2021 and are consistent with SCAQMD methodology. (Appendix C-4)

FL-B.7 This comment requests the EIR apply the SCAQMD Rule 2305 weighted average truck trip rates rather than the ITE rates. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), The Institute of Transportation Engineers (ITE) trip generation rates are the industry-accepted forecast for trip generation of development projects and is currently the best data available for forecasting trip generation. As described by SCAQMD:

> "[The] 2014 SCAQMD High Cube Warehouse Truck Trip Study was a multi-year effort that concluded with the Institute of Transportation Engineers (ITE) – the preeminent national organization for transportation engineers – completing the analysis and incorporating it into their industry standard Trip Generation Manual. This manual is the basis for the vast majority of transportation engineering studies conducted for development projects in South Coast AQMD and throughout the nation, and continues to be used today. The trip rates are also incorporated into CalEEMod, the primary model used throughout the state to estimate air quality impacts from new development, including for warehousing.
>
> While different types of warehousing will have different trip characteristics, the use of the ITE trip rates provide the most reasonable average to consider a large population of warehouses".[2]

On May 7, 2021, SCAQMD adopted Rule 2305 - Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Owners and operators associated with warehouses 100,000 square feet or larger are required to directly reduce nitrogen oxides (NO_X) and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. The rule imposes a "Warehouse Points Compliance Obligation" (WPCO) on warehouse operators. Operators satisfy the WPCO by accumulating "Warehouse Actions and Investments to Reduce Emissions Points" (WAIRE Points) in a given 12-month period. WAIRE Points are awarded by implementing measures to reduce emissions listed on the WAIRE Menu, or by implementing a custom WAIRE Plan approved by the SCAQMD in its WAIRE Implementation Guidelines, dated June 2021.

[2] http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10

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

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

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

In developing Rule 2305 unweighted truck trip generation rates, SCAQMD utilized the 2016 ITE High-Cube Warehouse Vehicle Trip Generation Analysis and supplemented with data from the City of Fontana's 2003 Truck Trip Generation Study.[4] To estimate the Project's truck trip generation, the 2022 Traffic Analysis used trip-generation statistics published in the ITE Trip Generation Manual (11th Edition, 2021) and the WRCOG High Cube Warehouse Trip Generation Study (WSP, January 2019), as these were the best available sources of data at the time of preparation.

Table FL-B.7-1 compares the truck trip generation rates used in the 2022 Traffic Analysis to the unweighted truck trip generation rates used in Rule 2305 and demonstrates the estimated truck trips are substantially the same.

Table FL-B.7-1

	Project TSF	ITE Truck Rate	ITE Truck Trips	Rule 2305 Unweighted Truck Rate	Rule 2305 Truck Trips
High-Cube	2,562.561	0.379	972	0.45	1,154
Warehouse	1,234.218	0.57	706	0.35	432

[3] http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10

[4] May 2021 SCAQMD Final Staff Report – Rule 2305, pg. 47; https://www.ite.org/pub/?id=a3e6679a%2De3a8%2Dbf38%2D7f29%2D2961becdd498; https://tampabayfreight.com/pdfs/Freight%20Library/Fontana%20Truck%20Generation%20Study.pdf.

Table FL-B.7-1

	Project TSF	ITE Truck Rate	ITE Truck Trips	Rule 2305 Unweighted Truck Rate	Rule 2305 Truck Trips
Cold Storage	500	0.75	376	1.04	520
TOTAL	**4,296.779**	**—**	**2,054**	**—**	**2,106**

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

As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4), utilizing the trip generation rates based on Rule 2305, the proposed Project would only generate an additional 52 truck trips. The analysis relies on the trip rates presented in the Project traffic study, which has been reviewed by RCTLMA. The trip rates presented in the Project traffic study are based on ITE rates and the SCAQMD High-Cube Warehouse Truck Trip Study, which are based on surveys of similar facilities. As such, DPM emissions from trucks are not understated in the analysis.

Notwithstanding, as shown above, even if the SCAQMD's method and recommended trip rates were utilized, this would only result in an additional 52 daily truck trips (2,106 vs 2,054). This represents an approximate potential 2.53% increase in truck trips and consequently emissions and risk. Even if the health risk estimates disclosed in the DEIR were increased by 2.53%, they would remain less than significant, and no new impacts would occur. MM-AQ-5 requires all Project site plans to include documentation confirming the site plan's environmental impacts do not exceed the impacts identified and disclosed in the Draft EIR; absent such documentation, additional environmental review will be required.

FL-B.8 This comment requests the Project implement additional mitigation measures such as 100% solar and a community benefit fund. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Regarding solar, MM-GHG-1 requires rooftop solar photovoltaic (PV) electricity generation sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. Regarding a community benefit fund, the Project Development Agreement includes the construction of the Meridian Fire Station. Additionally, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete. Please see Recirculated Section 4.2, Air Quality, for discussion of the additional mitigation measures proposed.

FL-B.9 This comment requests mitigation requiring 40% of construction vehicles be battery-electric or zero-emission equivalents. MM-AQ-1 requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. MM-AQ-3 would further reduce the Project's air quality impacts during construction with the following requirements and restrictions:

- No grading shall occur on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the project area (Source Receptor Area 23).
- Contractor shall require all heavy-duty trucks hauling onto the project site to be model year 2014 or later. This measure shall not apply to trucks that are not owned or operated by the contractor since it would be infeasible to prohibit access to the site by any truck that is otherwise legal to operate on California roads and highways.
- No construction equipment idling longer than three (3) minutes shall be permitted.
- All construction equipment to be tuned and maintained in accordance with the manufacturer's specifications, with maintenance records onsite and available to regulatory authorities upon request.
- No diesel-powered portable generators shall be used, unless necessary due to emergency situations or constrained supply.
- Contractor required to provide transit and ridesharing information to onsite construction workers.
- Contractor required to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service.
- Use of electric-powered hand tools, forklifts and pressure washers, to the extent feasible.
- Designation of an area in the construction site where electric-powered construction vehicles and equipment can charge.

Recirculated Section 4.2, Air Quality, determined the Project would have less than significant construction air quality impacts with implementation of MM-AQ-1 through MM-AQ-4 and additional mitigation is not required. Furthermore, there is no certainty that it would be feasible for 40% of construction vehicles to be battery-electric or zero-emission equivalents at the time of construction. As the Project would have less than significant impacts as mitigated, March JPA declines to impose the requested additional mitigation.

FL-B.10 This comment requests mitigation prohibiting blasting in close proximity to housing. PDF-NOI-2 prohibits blasting within 1,000 feet of any residence or other sensitive receptor. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the Mitigation Monitoring and Reporting Program (MMRP). March JPA will monitor compliance through the MMRP.

FL-B.11 This comment requests mitigation requiring 50% of delivery vehicles and 30% of truck fleets to be electrified by 2028, increasing to 100% by 2031. MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission

vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed.

FL-B.12 This comment questions the implementation of mitigation and enforcement post March JPA sunset. The project design features and mitigation measures will be incorporated into the Project MMRP. Please see Topical Response 9 – Long-Term Project Implementation and Enforcement, for a discussion of the County of Riverside's role when March JPA's land use authority reverts back in 2025.

9.4.3 Form Letter C Responses to Comments

Comment Letter	Name	Date
Individuals		
I-80	John Viafora	2/21/2023
I-87	Erin Conlisk	2/21/2023
I-93	Melissa Suarez	2/21/2023
I-97	Molly Brooke Becker	2/21/2023
I-102	Kristy Doty	2/22/2023
I-115	Mark Calhoun	2/22/2023
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I-351	Kevin Carney	2/28/2023
I-360	Luis Rodriguez	2/28/2023
I-362	Melissa Zimmerman	2/28/2023
I-373	Berenice Dixon	2/28/2023

Comment Letter	Name	Date
Individuals		
I-376	Dahlia Subaran	2/28/2023
I-384	Drew Ward	2/28/2023
I-399	Bobby Robinette	3/1/2023
I-406	Cynthia Spring-Pearson	3/1/2023
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I-417	Lori Nelson	3/1/2023
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I-444	Ginette Lillibridge	3/2/2023
I-450	Kristin Fyfe	3/2/2023
I-457	Peter Pettis	3/2/2023
I-460	Aaron Bushong	3/3/2023
I-474	Annabelle Porter	3/3/2023
I-479	Constance King	3/4/2023
I-486	Don Morris	3/4/2023
I-489	Lynn & Paul Larsen	3/4/2023
I-493	Amy Litt	3/5/2023
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I-584	Felix & Felicia Valencia	3/6/2023
I-587	Jason Gonsman	3/6/2023
I-599	Maria Rodriguez	3/6/2023
I-624	Michele Muehls	3/7/2023
I-633	Michelle Singleton	3/7/2023
I-641	Rosario Garcia	3/7/2023
I-649	Stephanie Jimenez	3/7/2023
I-673	Melody Clark	3/8/2023
I-675	Steve Huddleston	3/8/2023
I-677	Sarah Williams	3/8/2023
I-683	Anza Akram	3/9/2023
I-691	Abigail Banning	3/9/2023
I-700	Amber Peaslee	3/9/2023
I-708	Allison Bushong	3/9/2023

Comment Letter	Name	Date
Individuals		
I-731	Cynthia Jessen	3/9/2023
I-735	Christine Martin	3/9/2023
I-753	David Doty	3/9/2023
I-771	Freddie Quintana	3/9/2023
I-799	Leslie Bushong	3/9/2023
I-814	Linda TinglyRivera	3/9/2023
I-825	Mark Jessen	3/9/2023
I-855	Ronald Peters	3/9/2023
I-870	Sally Quintana	3/9/2023
I-873	Tim Martin	3/9/2023
I-927	Mason Deluhery	3/10/2023
I-931	Nicole Bernas	3/10/2023
I-943	Pete Elliot	3/10/2023
I-946	Rattana Chiek	3/10/2023
I-964	Veronica Juarez	3/10/2023

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Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. FL-C.1 FL-C.2 FL-C.3

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. FL-C.4

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old. FL-C.5

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life? FL-C.6
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted. FL-C.7

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced? FL-C.8

Thank you for allowing me to provide comments on this project.

Form Letter C Response – Biological Resources

FL-C.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

FL-C.2 This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required.

FL-C.3 This comment requests a non-industrial alternative to the Project. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated.

FL-C.4 This comment expresses concern about the shrinking of open spaces and destruction of habitat. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. Thus, the Project designates more land for non-development uses and does not introduce new designated uses.

The comment requests the Draft EIR's analysis include the Western Riverside County MSHCP Species Observations Database. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), the Western Riverside County MSHCP Species Observations Database provides location documentation for MSHCP monitoring surveys conducted within MSHCP conservation areas. Locations from the MSHCP database for species considered to be special-status by state and/or federal agencies are also uploaded to the California Natural Diversity Database (CNDDB), which was reviewed as part of the project effort. During desktop analysis, a CNDDB search for a 3-mile radius around the Project site was conducted; this search radius distance is standard industry practice. Based on this comment, however, the Western Riverside County MSHCP Species Observations Database was reviewed on CDFW BIOS on March 2, 2023. No special-status wildlife species were recorded within this database for a 3-mile radius around the Project site.

FL-C.5 This comment requests that studies that are more than a year old be redone. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), all surveys are relatively recent and reflect site conditions that continue to exist at the time of this writing. The vernal pool branchiopod surveys were completed in July 2022, protocol coastal California gnatcatcher surveys were completed on March 1, 2022, and protocol least Bell's vireo surveys were completed on July 21, 2022. There is

no formal regulatory guidance regarding survey 'age' and the agencies address survey validity on a case-by-case basis based on the type of survey, likelihood of species occurrence, seasonal conditions, etc. According to Section II(b) of the USFWS *Survey Guidelines for the Listed Large Branchiopods* (2017), "A complete survey consists of one wet season and one dry season survey conducted and completed in accordance with the guidelines and conducted within a 3-year period. The order of the surveys is not important." This guidance suggests that the USFWS considers surveys valid for more than one year for these species. Both the CDFW and USFWS have had the opportunity to review the survey results and timing during CEQA review and have not raised any concerns.

FL-C.6 This comment asks about details for coastal scrub. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), in the Upper Plateau Project Biological Technical Report (Appendix D-1), and Table 4.3-7 in the Draft EIR, permanent impacts on 5.54 acres of Riversidean sage scrub, 4.05 acres of disturbed Riversidean sage scrub, and 4.56 acres of flat-topped buckwheat are disclosed. These vegetation communities are subtypes of coastal scrub. MM-BIO-8 addresses the impacts to these habitats through the purchase of 13.66 acres of coastal or Riversidean sage scrub credits at an approved mitigation bank.

The Draft EIR assessed the impacts on coastal scrub. Riversidean sage scrub, disturbed Riversidean sage scrub, and flat-topped buckwheat are all forms of coastal scrub; therefore, coastal scrub is included in the analysis. The report previously referred to these communities as subtypes of coastal sage scrub. While coastal sage scrub and coastal scrub are often used interchangeably, it would be more correct to omit the word sage. As such, both the Draft EIR and the Upper Plateau Project Biological Technical Report have been revised accordingly. Please note that the plants section of Section 4.3, Biological Resources, and the Upper Plateau Project Biological Technical Report is an assessment of individual special-status plant species; all special-status plant species with potential for occurrence within on-site habitats, including sage scrub habitats, were assessed in the plant section. The wording in the plant potential for occurrence tables has been modified to ensure the presence of coastal scrub is evident. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

FL-C.7 This comment questions why surveys were done in a drought year and questions how some rare plants can be determined to be absent during a year and season where the rare plant life would grow. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), focused surveys for paniculate tarplant, a CRPR 4.2 species, and smooth tarplant, a CRPR 1B.1 species, were conducted during appropriate seasonal windows by qualified biologists experienced in identifying both species. While it is recognized that smooth tarplant is rarer than paniculate tarplant, it is not listed as threatened under the California Endangered Species Act.

Although 2022 was a drought year in Riverside County, there were areas of the Project site that supported conditions suitable for this species to bloom, including near drainages and in/around ponded areas examined during wet season vernal pool branchiopod surveys. During a drought year, it would be unlikely to find a large population of smooth tarplant in bloom as abundance is correlated with rainfall; however, drought conditions do not preclude all individuals in a population from blooming. Tarplant surveys were conducted to allow for 100% visualization; therefore, small numbers of individuals would have been detected, if present.

In addition, smooth tarplant was observed in Riverside County in 2022.[1] It was also recorded annually from 2000 through 2018 and Riverside County experienced drought conditions in the majority of these years.[2]

There is a smooth tarplant population at Sycamore Canyon Wilderness Park north of the Project site. Only one other record of smooth tarplant was located within the 3-mile study area. This record is from a collection made in 1995 from land east of the Project site. There are no additional records of smooth tarplant within a 3-mile radius of the Project. Other recent surveys for smooth tarplant performed in similar habitat within the vicinity of the Project site were conducted during non-drought years and were also negative for smooth tarplant.[3] As such, no revisions or updates to the results of the 2022 tarplant survey are required.

The comment further requests the inclusion of coastal scrub in the plant section analysis and completion of a rare plant survey during a non-drought year. In response, please see Responses to Comments FL-C-6 and FL-C-7.

FL-C.8 This comment questions mitigation enforcement when March JPA sunsets. In response to this comment, please see Topical Response 9 – Long-Term Project Implementation and Enforcement.

[1] Calflora: Information on California plants for education, research, and conservation, with data contributed by public and private institutions and individuals. (2023). Berkley, CA. The Calflora Database. Retrieved March 22, 2023, from https://www.calflora.org/entry/observ.html?track=m#srch=t&lpcli=t&taxon=Centromadia+pungens+ssp.+laevis&chk=t&cch=t&cnabh=t&inat=r&cc=RIV.

[2] U.S. Drought Monitor (USDM). (2023). Historical Drought Data & Conditions Tool: U.S. Drought Portal. Retrieved March 22, 2023, from https://www.drought.gov/data-maps-tools/historical-drought-data-conditions-tool.

[3] Rocks Biological Consulting. (2017). West Campus Lower Plateau Project Biological Resources Report.

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9.4.4 Form Letter D Response to Comments

Comment Letter	Name	Date
Individuals		
I-83	John Viafora	2/21/2023
I-92	Melissa Suarez	2/21/2023
I-105	Kristy Doty	2/22/2023
I-114	Mark Calhoun	2/22/2023
I-122	DJ Weems	2/22/2023
I-126	David Doty	2/23/2023
I-129	Kristy Doty	2/23/2023
I-130	Kristy Doty	2/23/2023
I-133	Nicolette Rohr	2/23/2023
I-140	Crystal McCreary	2/24/2023
I-154	Ana Ramirez	2/25/2023
I-163	Kristy Doty	2/26/2023
I-183	Benjamin Fernandez	2/27/2023
I-190	Chad Smith	2/27/2023
I-199	chrisr3685@yahoo.com	2/27/2023
I-200	chrisr3685@yahoo.com	2/27/2023
I-211	Denette Lemons	2/27/2023
I-213	Eunhee Kim	2/27/2023
I-224	Fernando Sosa Jr.	2/27/2023
I-234	Joseph Aklufi	2/27/2023
I-243	Janet Oien	2/27/2023
I-252	Josie Sosa	2/27/2023
I-263	Kathleen Jump	2/27/2023
I-270	Suzanee Page	2/27/2023
I-293	Q'Vinc Asberry	2/27/2023
I-299	Richard Arvizu	2/27/2023
I-313	Tony Harkness	2/27/2023
I-323	amaharris12@gmail.com	2/28/2023
I-332	Ann and Dolores Marchand	2/28/2023
I-341	Jennifer Zamora	2/28/2023
I-348	Karen Bartell	2/28/2023
I-359	Luis Rodriguez	2/28/2023
I-383	Drew Ward	2/28/2023
I-387	Francine Carbajal	2/28/2023
I-398	Bobby Robinette	3/1/2023
I-405	Cynthia Spring-Pearson	3/1/2023
I-421	Maria Estabrooks	3/1/2023
I-430	Senanu Spring-Pearson	3/1/2023
I-438	Carlos Lliguin	3/2/2023
I-445	Kristin Fyfe	3/2/2023
I-449	Kristin Fyfe	3/2/2023
I-456	Peter Pettis	3/2/2023
I-461	Aaron Bushong	3/3/2023

Comment Letter	Name	Date
Individuals		
I-473	Annabelle Porter	3/3/2023
I-484	Don Morris	3/4/2023
I-485	Don Morris	3/4/2023
I-513	Elise Estrella-Hahn	3/5/2023
I-539	Joe Aklufi	3/5/2023
I-552	Ryan Joseph	3/5/2023
I-564	Tia Ballesteros	3/5/2023
I-573	Beverly Arias	3/6/2023
I-588	Jason Gonsman	3/6/2023
I-598	Maria Rodriguez	3/6/2023
I-623	Michele Muehls	3/7/2023
I-632	Michelle Singleton	3/7/2023
I-648	Stephanie Jimenez	3/7/2023
I-656	Christine Martin	3/8/2023
I-662	Kristy Doty	3/8/2023
I-670	Linda Tingly	3/8/2023
I-679	Tim Martin	3/8/2023
I-690	Abigail Banning	3/9/2023
I-699	Amber Peaslee	3/9/2023
I-709	Allison Bushong	3/9/2023
I-730	Cynthia Jessen	3/9/2023
I-734	Christine Martin	3/9/2023
I-742	Clay Muehls	3/9/2023
I-752	David Doty	3/9/2023
I-770	Freddie Quintana	3/9/2023
I-774	Gayle DiCarlantonio	3/9/2023
I-800	Leslie Bushong	3/9/2023
I-813	Linda TinglyRivera	3/9/2023
I-824	Mark Jessen	3/9/2023
I-839	Milo Rivera	3/9/2023
I-854	Ronald Peters	3/9/2023
I-869	Sally Quintana	3/9/2023
I-884	Abdallah Karim	3/10/2023
I-885	Abdallah Karim	3/10/2023
I-888	Abdallah Karim	3/10/2023
I-898	Andrew Silva	3/10/2023
I-903	Brian Wardle	3/10/2023
I-933	Nicole Bernas	3/10/2023
I-944	Pete Elliot	3/10/2023
I-947	Rattana Chiek	3/10/2023
I-963	Veronica Juarez	3/10/2023

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. FL-D.1 FL-D.2 FL-D.3

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area. FL-D.4 FL-D.5 FL-D.6

Specifically, I would like to ask:

1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section? FL-D.7 FL-D.8
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project? FL-D.9
3. Why were PFAS and perchlorate omitted in soil testing? FL-D.10
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis? FL-D.11
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area. FL-D.12

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers. FL-D.13

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm. FL-D.14

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance. FL-D.15

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed FL-D.16

Thank you for allowing me to provide comments on this project.

Form Letter D Response – Hazards

FL-D.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

FL-D.2 This comment asserts that the Draft EIR does not adequately analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. The Draft EIR properly analyzed all topics. This comment does not raise any specific issues, concerns or questions about the environmental analysis in the Draft EIR, all specific comments related to the analysis are addressed below and more broadly in the Final EIR.

FL-D.3 This comment requests a non-industrial alternative to the Project. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative is introduced and evaluated.

FL-D.4 This comment questions the amount and extent of site characterization activities that have occurred at the Specific Plan Area. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, of the Draft EIR, a Phase I Environmental Site Assessment (ESA) was performed by Leighton in 2021. The purpose of the Phase I ESA was to identify recognized environmental conditions (RECs), historical RECs (HRECs), or controlled RECs (CRECs) in connection with the Specific Plan Area. As noted in Section 4.8, Hazards and Hazardous Materials, as well as the Phase I ESA, a REC is defined as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment." As such, the Phase I ESA is designed to assess whether soil or other additional testing is necessary to characterize the extent, if any, of contamination on the Specific Plan Area. As shown on Figure 1 thereof, the Phase I ESA covers the Specific Plan Area and determined the extent to which any additional soil characterization was required. The Phase I ESA found nine RECs at the Specific Plan Area. As a result of the RECs identified in the Phase I, a Phase II ESA for the Specific Plan Area was performed by Leighton in 2022 and included confirmation sampling activities, as recommended by the Phase I ESA.

A summary of the Phase I RECs and sampling activities conducted under the Phase II ESA, as well as the results of the Phase II ESA are summarized in the Recirculated Section 4.8, Hazards and Hazardous Materials. Soil samples from various areas of the Specific Plan Area were selectively analyzed for the following compounds, using the USEPA analytical methods described below:

Table 7A: Analytical Methods		
Compound	**USEPA Method**	**Notes / Method Detection Limits (MDLs)**
Total Petroleum Hydrocarbons (TPH)	8015B	C_5-C_{44} carbon chain range Standard MDLs= 10 to 50 mg/kg
Semi Volatile Organics (SVOCs)	8270C	Standard MDLs = 0.014 to 0.387 mg/kg
Organochlorine Pesticides (OCPs)	8081A	Standard MDLs = 0.0001 to 0.010 mg/kg
PCBs	8082	Standard MDLs = 0.005 mg/kg
Chlorinated Herbicides (CH)	8151A	Standard MDLs = 0.01 – 10 mg/kg
Asbestos	600/R-93/116 600/MR-82-020	MDL = 1%
Title 22 Metals / Individual Metals	6010B / 7471A	17 metals Standard MDLs = 0.0062 to 0.432 mg/kg

The analytical results by Area were as follows:

- Historical Area of Unknown U-Shaped Feature
  - Sampling trenches SP1-SP5 were completed in this area, which was previously identified to have been actively used between approximately 1962 and 1989. This U-shaped feature is an asphalt covered area, with an asphalt access roadway leading to it. A summary of analytical results is as follows:
    - TPH - No TPH C5-C44 was detected in any of the analyzed soil samples, except for 18.7 mg/kg of TPH C10-C28 (diesel range) in one sample (SP4-0.5).
    - SVOCs - No detected SVOCs were reported in any of the five soil samples analyzed from this area.
    - OCPs - Trace concentrations of 4,-4' DDE (0.0008 mg/kg maximum) and Endrin Aldehyde (0.0006 mg/kg maximum) were reported in three of six samples analyzed for OCPs. Every other OCP compound was reported to be not detected.
    - PCBs - No detected PCBs were reported in any of the six samples analyzed from this area.
    - Title 22 Metals – Seven soil samples from this area (most from 0.5 feet bgs, and a few from 2.5 feet bgs) were analyzed, and were reported to have Title 22 metals either not detected, or detected at concentrations below the respective metal screening level for commercial/industrial use soil. The maximum reported lead concentration in these samples is 6.66 mg/kg.
- Historical Building/Storage Area 1
  - TPH - No detected TPH C5-C44 was reported in any of the six analyzed soil samples from this area.
  - SVOCs, OCPs, PCBs - No detected SVOCs, OCPs or PCBs were reported in any of the four soil samples analyzed from this area.
  - Title 22 Metals - Six soil samples from this area (half from 0.5 feet bgs, and half from 2.5 feet bgs) were analyzed, and were reported to have Title 22 metals either not detected, or

detected at concentrations below the respective metal screening levels for commercial/industrial use soil. The maximum reported lead concentration in these samples is 1.95 mg/kg.

- Historical Cleared Area 1
  - TPH - No detected TPH C5-C44 was reported in any of the six analyzed soil samples from this area.
  - SVOCs, OCPs, PCBs - No detected SVOCs, OCPs or PCBs were reported in any of the four soil samples analyzed from this area.
  - Title 22 Metals - Four soil samples from this area (all from 0.5 feet bgs) were analyzed, and were reported to have Title 22 metals either not detected, or detected at concentrations below the respective metal screening levels for commercial/industrial use soil. The maximum reported lead concentration in these samples is 4.12 mg/kg.
- Historical Cleared Area 2 and Building Storage Area 2
  - TPH - No detected TPH C5-C44 was reported in any of the ten analyzed soil samples from this area.
  - SVOCs, OCPs - No detected SVOCs or OCPs were reported in any of six soil samples analyzed from this area, with the exception of sample SP17-0.5, which was reported to contain eight SVOC compounds at low concentrations.
  - Title 22 Metals - Six soil samples from this area (half from 0.5 feet bgs, and half from 2.5 feet bgs) were analyzed, and were reported to have Title 22 metals either not detected, or detected at concentrations below the respective metal screening levels for commercial/industrial use soil. The maximum reported lead concentration in these samples is 2.64 mg/kg.
- Decomposed Granite Stockpile
  - TPH - No detected TPH C5-C44 was reported in any of the three analyzed soil samples from this area.
  - SVOCs, PCBs - No detected SVOCs or PCBs were reported in any of three soil samples analyzed from this area.
  - Title 22 Metals – Three soil samples from this area were analyzed, and were reported to have Title 22 metals either not detected, or detected at concentrations below the respective metal screening levels for commercial/industrial use soil. The maximum reported lead concentration in these samples is 0.536 mg/kg.
- Water Cooling Tower Area
  - SVOCs - No detected SVOCs were reported in any of four soil samples analyzed from this area, with the exception of sample CT2-0.5 and CT4-0.5, which were each reported to contain numerous SVOC compounds at minor concentrations.
  - Asbestos – No detected asbestos was reported in any of the four shallow (0.5 feet bgs) soil samples collected near this feature.
  - Title 22 Metals - Nine soil samples from this area (some from 0.5 feet bgs, and some from 2.5 feet bgs) were analyzed, and were reported to have Title 22 metals either not detected, or detected at concentrations below the respective metal screening levels for commercial/industrial use soil. The maximum reported lead concentration in these samples is 71.4 mg/kg.

- Building 2 Area
  - TPH – TPH C5-C12 (gasoline range) is reported in 2 of 12 samples from this area, at reported concentrations ranging from 5.23 to 10.2 mg/kg. TPH C10- C28 (diesel range) is reported in 8 of 12 samples from this area, at reported concentrations ranging from 8.24 to 25.8 mg/kg. TPH C17-C44 (oil range) is reported in 4 of 12 samples from this area, at reported concentrations ranging from 26.5 to 138 mg/kg.
  - SVOCs, PCBs - No detected SVOCs or PCBs were reported in any of six soil samples analyzed from this area.
  - CHs – No detected CHs were reported in any of the three soil samples analyzed from this area.
  - Title 22 Metals - Six soil samples from the soil borings in this area were analyzed, and were reported to have Title 22 metals either not detected, or detected at concentrations below the respective metal screening levels for commercial/industrial use soil. The maximum reported lead concentration in these samples is 3.13 mg/kg.
- Electrical Substation Areas (Building 2 and Building 4)
  - PCBs - No detected PCBs were reported in any of ten soil samples analyzed from this area, with the exception of one sample (ES1-3-2.5), which was reported to contain 0.009 mg/kg of only one isomer of PCB (i.e PCB1254). This concentration is considered minor.
  - Title 22 Metals – Five soil samples from this area (all from 0.5 feet bgs) were analyzed, and were reported to have Title 22 metals either not detected, or detected at concentrations below the respective metal screening levels for commercial/industrial use soil. The maximum reported lead concentration in these samples is 3.3 mg/kg.
- Pad Mounted Electrical Transformers (Bldg. 5 and NE Edge of Ordnance Bunker Area)
  - PCBs - No detected PCBs were reported in any of six soil samples analyzed from this area.
  - Title 22 Metals – Two soil samples from this area (from 0.5 feet bgs) were analyzed, and were reported to have Title 22 metals either not detected, or detected at concentrations below the respective metal screening levels for commercial/industrial use soil. The maximum reported lead concentration in these samples is 26.0 mg/kg.

The Phase II ESA included a summary of these results relative to USEPA and DTSC generic soil screening levels, which have been established to determine a concentration of no significant additional health risks, in this case, for a commercial/industrial use scenario.

- TPH
  - No detected TPH was reported in 40 of 49 total samples analyzed.
  - TPH C5-C12 (gasoline range) was reported in only one sample, at a minor concentration of 5.32 mg/kg. This is below the 420 mg/kg USEPA soil screening level for soil in a commercial/industrial use scenario.
  - TPH C10-C28 (diesel range) was reported in nine samples at concentrations ranging from 8.24 to 25.8 mg/kg. These concentrations are all below the 500 to 560 mg/kg DTSC and USEPA soil screening levels for soil in a commercial/industrial use scenario.
  - TPH C17-C44 (oil range) was reported in four samples at concentrations ranging from 26.5 to 138 mg/kg. These concentrations are all below the 18,000 to 30,000 mg/kg DTSC and USEPA soil screening levels for soil in a commercial/industrial use scenario.
- SVOCs

  - No detected SVOCs were reported in 26 of 29 total samples analyzed.
  - Minor concentrations of 10 SVOCs (acenapthylene, benzo(a)anthracene, benzo (b) fluoranthene, benzo (g,h,i) perylene, butylbenzylphthalate, chrysene, fluoranthene, fluorine, phenanthrene and pyrene) were reported in three samples, all at concentrations below DTSC and USEPA soil screening levels (where they exist) for soil in a commercial/industrial use scenario.
- OCPs
  - No detected OCPs were reported in 17 of 20 total samples analyzed.
  - Minor concentrations of 3 OCPs (4-4' DDE and Endrin Aldehyde) were reported in three samples, all at concentrations below DTSC and USEPA soil screening levels (where they exist) for soil in a commercial/industrial use scenario.
- PCBs
  - No detected PCBs were reported in 38 of 39 total samples analyzed.
  - One sample was reported to contain 0.009 mg/kg of Aroclor1254, which is below the 0.59 to 0.97 mg/kg DTSC and USEPA soil screening levels for soil in a commercial/industrial use scenario.
- Chlorinated Herbicides
  - No detected Chlorinated Herbicides were reported in 3 of 3 total samples analyzed.
- Asbestos
  - No detected asbestos was reported in 4 of 4 total samples analyzed. Samples around the base of the water cooling tower were analyzed for asbestos due to concerns with potential asbestos containing materials on the tower.
- Title 22 Metals
  - A total of 48 samples, all collected from 0.5 to 2.5 feet bgs, were analyzed for Title 22 metals. All reported concentrations of metals, except arsenic, were below their respective DTSC and USEPA soil screening levels (where they exist) for soil in a commercial industrial use scenario.
  - Arsenic concentrations in some samples exceed their DTSC and/or USEPA soil screening level for commercial/industrial use; however, the maximum reported concentration is 3.89 mg/kg, which is substantially below the more applicable DTSC Regional Background Arsenic Concentration screening level of 12 mg/kg.
  - A maximum of 71.4 mg/kg of total lead was reported in sample CT2-0.5. The next highest detected total lead was 26 mg/kg. These concentrations are below the 320 to 800 mg/kg DTSC and USEPA soil screening levels for soil in a commercial/industrial use scenario. The sample with 71.4 mg/kg of total lead was also run for soluble lead, and reported to contain 1.33 mg/L, which is below the Soluble Threshold Limit Concentration of 5.0 mg/L (criteria for determining if a waste is California hazardous or not).

The Phase II ESA confirms that based on field observations and laboratory analytical data from the soil samples collected during the Phase II. The expert consultant concluded that no additional soil sampling was recommended. In addition, as indicated in the 2023 Leighton Report, all COCs in soil samples collected during the Phase II are below construction worker and residential screening levels.

FL-D.5 This comment asserts, without any evidence or reason, that "when trucks begin driving into the complex, more than diesel PM will be admitted *[sic]."* It is unclear from the comment what additional emissions are being asserted. At the outset, we note that CEQA does not require speculation. *See, e.g. Laurel Heights Improvement Assn. v Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1137.

With respect to other toxic air contaminants, the Health Risk Assessment (HRA) prepared for the project includes diesel particulate matter (DPM) because it is the primary toxic air contaminant (TAC) that would be emitted during construction and operation of the Project from construction equipment and trucks. While passenger vehicles would also emit TACs, because the passenger vehicle fleet is predominantly gasoline powered, and TAC emission rates from gasoline engines are significantly lower than diesel engine TAC emission rates, the TAC emissions generated by heavy duty trucks result in significantly more risk. Please see Response RA-6.3 for an expanded discussion of gasoline emissions and health risk assessments. Consistent with industry standards, the focus of the HRA is on diesel exhaust as the primary TAC that has the propensity to affect receptors in the vicinity of the Project. All other TACs that may result from passenger vehicles would not generate a greater risk, and in fact, would represent a fraction of the risk for diesel exhaust. Furthermore, the International Agency for Research on Cancer (IARC), which is part of the World Health Organization (WHO), has classified diesel engine exhaust as "carcinogenic to humans" (Group 1) based on sufficient evidence of its carcinogenicity to humans. This classification is in contrast to gasoline engine exhaust, which is classified as "probably carcinogenic to humans" (Group 2A) due to limited evidence in humans. (Appendix C-4)

With respect to hazardous substances, as noted in Response FL-D.4 above, there are no concentrations of any contaminant of concern (COC) in soil that exceed screening levels for a commercial/industrial use scenario, with the exception of arsenic, which was still substantially below the DTSC Regional Background Arsenic Concentration screening level.[1] In addition, as summarized in the 2023 Leighton Report, included as Appendix J-6 to this Final EIR, "all concentrations of analyzed compounds in the soil samples are well below the screening levels for hypothetical on-site construction workers or hypothetical on-site residential occupants." As such, no COCs will be present at any unacceptable level in the dust generated during construction at the Specific Plan Area. In addition, despite there being no evidence that any hazardous substances will be encountered during construction of the Project, we note that the Project will be required to comply with dust suppression and other air quality measures identified in the Draft EIR, including compliance with SCAQMD Rule 403, which governs fugitive dust and "requires fugitive dust sources to implement best available control measures for all sources to ensure all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (SCAQMD 2005)."

FL-D.6 This comment asks the JPA to require the applicant to perform comprehensive soil testing on the Specific Plan Area. As noted in Response FL-D.4 above, comprehensive soil testing has been performed on the Specific Plan Area. A Phase I ESA was prepared for the Project, which determined the type and extent of soil characterization required. That soil characterization was then performed as part of the Phase II ESA. The findings of the Phase II ESA are outlined in Section 4.8, Hazards and Hazardous

[1] As summarized by DTSC Human and Ecological Risk Office (HERO) Note 11, "[b]ackground inorganic elements in soil can prove problematic for risk assessment purposes because these elements detected at a site may be comprised of naturally occurring metals, regional anthropogenic contributions or a site-specific release." As further delineated in HERO Note 11, concentrations of arsenic in soil not exceeding the background level are not indicative of a site-specific release.

Materials, of the Draft EIR, as well as in Response FL-D.4 above, and found that there were no concentrations of any COC in soil that exceed screening levels for a commercial/industrial use scenario, with the exception of arsenic, which was still substantially below the DTSC Regional Background Arsenic Concentration screening level.

FL-D.7 This comment questions how the JPA determined "which chemicals to test for and which to omit." As noted in Response FL-D.4 above, a Phase I ESA was performed to determine the extent to which additional testing and characterization of the Specific Plan Area was required. A Phase I ESA consists of a review of all publicly available information pertaining to the uses and history of a site to determine whether any of those uses represent RECs, which may require additional sampling or characterization (typically done in a Phase II ESA). A Phase I ESA typically includes the following:

- Site reconnaissance, or a site visit to observe current and past conditions and uses of the property and adjacent properties;
- A review of federal, state, tribal, and local regulatory databases including, but not limited to, underground and aboveground storage tanks, known or suspected release cases, the storage of hazardous substances and disposal of hazardous wastes including petroleum products, and institutional and engineering controls;
- A review of historical records, such as historical aerial photographs, fire insurance maps, historical city directories, and historical topographic maps;
- A review of state and local agency records, including but not limited to state environmental agencies, Building Departments, Fire Departments, and Health Departments;
- Interviews with current and past property owners, operators, and occupants, or others familiar with the property.
- Interviews with the Report User for title or judicial records for environmental liens and activity and use limitations, specialized knowledge or experience, actual knowledge, commonly known or reasonably ascertainable information, and the reason for the preparation of the Phase I ESA.

Based on this information, the environmental consultant, in its professional judgment, determines which, if any, areas of the site require additional sampling or characterization activities and the COCs and media that should be sampled in those areas. This was the case here, as explained in Response FL-D.4 above, which details the RECs identified by the Phase I ESA as well as the recommendations for further sampling.

FL-D.8 This comment asks why diesel particulate matter was the only substance considered in the Human Risk Assessment. While passenger vehicles would also emit toxic air contaminants, because the passenger vehicle fleet is predominantly gasoline powered, and TAC emission rates from gasoline engines are significantly lower than diesel engine TAC emission rates, the TAC emissions generated by heavy duty trucks result in significantly more risk. Please see Response RA-6.3 for an expanded discussion of gasoline emissions and health risk assessments. Consistent with industry standards, the focus of the HRA is on diesel exhaust as the primary TAC that has the propensity to affect receptors in the vicinity of the Project. All other TACs that may result from passenger vehicles would not generate a greater risk, and in fact, would represent a fraction of the risk for diesel exhaust. Furthermore, the International Agency for Research on Cancer (IARC), which is part of the World Health Organization (WHO), has classified diesel engine exhaust as "carcinogenic to humans" (Group 1) based on sufficient evidence of its carcinogenicity to humans. This classification is in contrast to gasoline engine exhaust,

which is classified as "probably carcinogenic to humans" (Group 2A) due to limited evidence in humans and strong evidence in experimental animals. (Appendix C-4)

FL-D.9 This comment asks why known contaminants from other soil studies at the base were not tested in the soil studies for this Project. The comment does not further specify or assert contaminants that were not included which should have been included. The activities at the Specific Plan Area were different than other parts of the base. The sampling conducted at the Specific Plan Area as part of the Phase II ESA is consistent with the past activities at the Specific Plan Area, taking into account historical sampling and remediation conducted at the Specific Plan Area. As noted in Responses FL-D.4 and FL-D.7 above, the environmental consultant prepared a Phase I ESA to determine the extent to which additional site characterization was required and which COCs and media should be tested. If other COCs were previously identified at the Specific Plan Area and remediated to the satisfaction of the applicable regulatory agency, the environmental consultant may determine that additional characterization of those particular COCs is not necessary as, following remediation to the satisfaction of the applicable regulatory agency, those COCs no longer represent a risk to future site users. Various areas of the former March AFB has been assessed by the AFCEC for hazardous substances based on the nature of historical usage of these areas, and the likely risk of their release. In each case, assessment plans unique to the area were developed and then implemented under oversight from the following three environmental regulatory agencies: United States Environmental Protection Agency (USEPA), State of California Department of Toxic Substances Control (DTSC), and the Regional Water Quality Control Board (RWQCB). The AFCEC (with regulatory oversight) did not identify the former ordnance facility as needing assessment (AFCEC, 1998).

FL-D.10 This comment asks why PFAS and perchlorate were omitted in soil testing. With respect to PFAS, please refer to the Recirculated Section 4.8, Hazards and Hazardous Materials as well as Topical Response 3 – Hazards, for a discussion of PFAS. With respect to perchlorate, we have no information that indicates perchlorate would be present in soil on the Specific Plan Area. As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, the proposed Project is located in a former munitions storage area, in which munitions (and later fireworks) were stored indoors in secured concrete bunkers. As part of the Phase I, the concrete bunkers were inspected and the environmental professional noted that the "bunkers are constructed entirely of concrete" and that "[n]o evidence of floor pitting or staining was observed in the bunkers, and the concrete flooring was noted to be in excellent condition." As such, there is no pathway for perchlorate to the soil. There is no information to indicate that munitions or fireworks were disposed of in the Development Area and no indication that fireworks were manufactured on site and, as such, there is no evidence indicating a release of perchlorate to soil. Please refer to Topical Response 3 – Hazards as well as Recirculated Section 4.8, Hazards and Hazardous Materials, for a discussion of munitions disposal investigations. CEQA does not require speculation. *See, e.g. Laurel Heights Improvement Assn. v Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1137.

FL-D.11 This comment asks questions related to the contents of the bunkers as well as radioactive materials and chemical weapons. Please refer to Topical Response 3 – Hazards, as well as Recirculated Section 4.8, Hazards and Hazardous Materials, beginning on page 4.8-9, for a discussion of radiological weapons and biological and chemical weapons.

FL-D.12 This comment asks why soil sampling was only conducted in certain areas on the Specific Plan Area and suggests that a "systematic soil test panel" be conducted "in a grid pattern" over the entirety of

the construction area. As noted in Response FL-D.4 above, a Phase I ESA was performed for the Specific Plan Area, which identified RECs on the Specific Plan Area warranting additional sampling or characterization based on the historic uses of those areas. The findings of the Phase II ESA are outlined in Recirculated Section 4.8, Hazards and Hazardous Materials, as well as in Response FL-D.4 above, and found that there were no concentrations of any COC in soil that exceed screening levels for a commercial/industrial use scenario, with the exception of arsenic, which was still substantially below the DTSC Regional Background Arsenic Concentration screening level. The comment also suggests that migration of COCs may have occurred. There is no data to indicate, and commenter provides no evidence, that any COCs have migrated on site. CEQA does not require speculation. *See, e.g. Laurel Heights Improvement Assn. v Regents of Univ. of Cal.* (1993) 6 Cal 4th 1112, 1137. Given that the concentrations of COCs even at possible source sites identified as RECs are well below regulatory thresholds, there is no reason to test anywhere else. In addition, based on the topography of the March AFB, it is highly unlikely that anything would migrate from the rest of the March AFB up on to the Specific Plan Area.

FL-D.13 This comment lists several hazardous materials that commenter requests be included in the analysis. Please refer to the Recirculated Section 4.8, Hazards and Hazardous Materials, as well as Topical Response 3 – Hazards, for a discussion of PFAS, radiological, and biological and chemical weapons. With respect to perchlorate, please refer to Response FL-D.10 above. Trichloroethylene and perchloroethylene (tetrachloroethylene), also known as TCE and PCE, are volatile organic compounds or VOCs. As detailed in Section 4.2.6 of the Phase I ESA, the only facility within the area of concern of the Specific Plan Area with respect to vapor encroachment is Site 25, at which no VOCs, semi-VOCs, chlorinated herbicides, PCBs, PAHs, organophosphorus pesticides, or nitroaromatics/nitroamines were found in soil. Section 4.2.3 of the Phase I ESA notes that Site 3, which is also in the vicinity of the Specific Plan Area, also had no VOCs, semi-VOCs, chlorinated herbicides, PCBs, PAHs, organophosphorus pesticides, or nitroaromatics/nitroamines detected in the confirmation soil samples. This comment also requests "any information [the JPA] has as to what was stored in the bunkers." As indicated previously, we understand that the bunkers were used for the storage of munition. For more information on the types of munitions stored in the bunkers, please refer to Topical Response 3 – Hazards as well as Recirculated Section 4.8, Hazards and Hazardous Materials, for a discussion of radiological weapons and biological and chemical weapons.

FL-D.14 This comment questions the treatment of PCB-impacted soil on the Specific Plan Area. As indicated in Response FL-D.4 above, PCBs were sampled in connection with the Phase II ESA and no detected PCBs were reported in 38 of 39 total samples analyzed. One sample was reported to contain 0.009 mg/kg of Aroclor1254, which is below the 0.59 to 0.97 mg/kg DTSC and USEPA soil screening levels for soil in a commercial/industrial use scenario. As such, no data was found to indicate that PCB in soil needs to be remediated or otherwise "handled" on the Specific Plan Area.

FL-D.15 This comment indicates that the CEQA requires the lead agency to evaluate and disclose environmental risks and asserts that local residents "deserve to know the potential risks to their health." The JPA agrees with these comments. The comment goes on to assert that these risks can only be disclosed "with a full evaluation of the Weapons Storage Area." The JPA agrees with this comment as well and notes that the environmental status of the WSA has been comprehensively evaluated through numerous studies and remediation under the oversight of USEPA, DTSC, and RWQCB as well as through the studies conducted in connection with the Project. Please refer to Responses FL-D.4 and FL-D.9 above, and please refer to

Recirculated Section 4.8, Hazards and Hazardous Materials, as well as Topical Response 3 – Hazards, for a discussion of PFAS, radiological, and biological and chemical weapons.

FL-D.16 This comment requests that "comprehensive soil and weapons bunker testing" be performed to issuance of demolition or grading permits for the area and requests that, if any hazardous materials are "found in the soil or bunker in quantities that could be harmful during the project demolition phase" that such materials be removed. Please refer to Response FL-D.15 above, Recirculated Section 4.8, Hazards and Hazardous Materials, and Topical Response 3 – Hazards. Comprehensive environmental characterization of the Specific Plan Area has been completed and no contaminants of concern in soil were found in concentrations exceeding relevant screening levels for a commercial/industrial use scenario, or for construction worker or residential use scenarios. Multiple documents from relevant regulatory agencies have cleared the Project site for unrestricted use, including the Santa Ana Regional Water Quality Control Board in 2006, which, concurring with a site investigation, indicated that it concurred "with your finding of no release at the site, and the recommendation for no further action for the Weapons Storage Area." As such, no further remediation or removal activities are required. Please refer to Response FL-D.5 above for a discussion of safety measures to be followed during the construction phase.

9.4.5 Form Letter E Responses to Comments

Comment Letter	Name	Date
Individuals		
I-82	John Viafora	2/21/2023
I-96	Melissa Suarez	2/21/2023
I-103	Kristine Doty	2/22/2023
I-112	Mark Calhoun	2/22/2023
I-120	DJ Weems	2/22/2023
I-125	David Doty	2/23/2023
I-132	Kristy Doty	2/23/2023
I-136	Tom Parkinson	2/23/2023
I-139	Crystal McCreary	2/24/2023
I-155	Ana Ramirez	2/25/2023
I-172	Ajay Shah	2/27/2023
I-182	Benjamin Fernandez	2/27/2023
I-189	Chad Smith	2/27/2023
I-198	chrisr3685@yahoo.com	2/27/2023
I-214	Eunhee Kim	2/27/2023
I-223	Fernando Sosa Jr.	2/27/2023
I-233	Joseph Aklufi	2/27/2023
I-238	John W. Hagmann	2/27/2023
I-244	Janet Oien	2/27/2023
I-251	Josie Sosa	2/27/2023
I-262	Kathleen Jump	2/27/2023
I-269	Suzanee Page	2/27/2023
I-279	Michael Dearman	2/27/2023
I-289	Q'Vinc Asberry	2/27/2023
I-298	Richard Arvizu	2/27/2023
I-307	Sean Walsh	2/27/2023
I-324	amaharris12@gmail.com	2/28/2023
I-331	Ann and Dolores Marchand	2/28/2023
I-335	Ann and Dolores Marchand	2/28/2023
I-340	Jennifer Zamora	2/28/2023
I-347	Karen Bartell	2/28/2023
I-358	Luis Rodriguez	2/28/2023
I-365	Rachel Lathan	2/28/2023
I-372	Berenice Dixon	2/28/2023
I-374	Berenice Dixon	2/28/2023
I-375	Tom and Brenda Parkinson	2/28/2023
I-382	Drew Ward	2/28/2023
I-397	Bobby Robinette	3/1/2023
I-404	Cynthia Spring-Pearson	3/1/2023
I-408	Erin Swinfard	3/1/2023
I-414	K Doty	3/1/2023
I-422	Maria Estabrooks	3/1/2023
I-431	Senanu Spring-Pearson	3/1/2023

Comment Letter	Name	Date
Individuals		
I-448	Kristin Fyfe	3/2/2023
I-451	Kristin Fyfe	3/2/2023
I-455	Peter Pettis	3/2/2023
I-462	Aaron Bushong	3/3/2023
I-472	Annabelle Porter	3/3/2023
I-483	Don Morris	3/4/2023
I-499	Christopher Gate	3/5/2023
I-504	David Divani	3/5/2023
I-512	Elise Estrella-Hahn	3/5/2023
I-537	Joe Aklufi	3/5/2023
I-542	Mary Harris	3/5/2023
I-548	Ryan Joseph	3/5/2023
I-563	Tia Ballesteros	3/5/2023
I-570	Adolfo Saldana	3/6/2023
I-572	Beverly Arias	3/6/2023
I-583	Felix and Felicia Valencia	3/6/2023
I-597	Maria Rodriguez	3/6/2023
I-622	Michele Muehls	3/7/2023
I-631	Michelle Singleton	3/7/2023
I-640	Rosario Garcia	3/7/2023
I-647	Stephanie Jimenez	3/7/2023
I-655	Christine Martin	3/8/2023
I-666	Kristy Doty	3/8/2023
I-674	Milo Rivera	3/8/2023
I-678	Tim Martin	3/8/2023
I-689	Abigail Banning	3/9/2023
I-698	Amber Peaslee	3/9/2023
I-710	Allison Bushong	3/9/2023
I-729	Cynthia Jessen	3/9/2023
I-743	Clay Muehls	3/9/2023
I-751	David Doty	3/9/2023
I-761	Esmeralda Montes	3/9/2023
I-765	Freddie Quintana	3/9/2023
I-802	Leslie Bushong	3/9/2023
I-823	Mark Jessen	3/9/2023
I-853	Ronald Peters	3/9/2023
I-864	Sally Quintana	3/9/2023
I-883	Abdallah Karim	3/10/2023
I-906	Cindy Chiek	3/10/2023
I-911	Christopher Nielsen	3/10/2023
I-934	Nicole Bernas	3/10/2023
I-940	Pete Elliot	3/10/2023
I-948	Rattana Chiek	3/10/2023
I-962	Veronica Juarez	3/10/2023

Form Letter E

From: John Viafora <jrviafora@gmail.com>
Sent: Tuesday, February 21, 2023 9:56 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. FL-E.1 FL-E.2 FL-E.3

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. FL-E.4 FL-E.5

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies? FL-E.6

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. FL-E.7

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan? FL-E.8

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered FL-E.9

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

FL-E.9 Cont.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

FL-E.10

Thank you for letting me comment on your project.

Form Letter E Response – Project Consistency

FL-E.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

FL-E.2 This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required.

FL-E.3 This comment requests a non-industrial alternative to the Project. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative is introduced and evaluated.

FL-E.4 This comment requests a non-industrial alternative to the Project. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative is introduced and evaluated.

FL-E.5 This comment inaccurately states the Project site is zoned C-2. The March JPA General Plan designates the Project site as Business Park, Industrial, and Park/Recreation/Open Space. The Project site has not been assigned a zoning designation per the official March JPA Zoning Map, as shown on Figure 3-3, March JPA Zoning Designations, of the EIR. The comment may be referencing the Project site's compatibility zone under the March ARB/IPA Airport Land Use Compatibility Plan (ALUCP). Under the ALUCP, the Project site is located within the C1 Primary Approach/Departure Zone and C2 Flight Corridor Zone. The ALUCP provides noise and safety policies governing development of compatible future land uses in areas within the airport influence area.

FL-E.6 The comment references Planning Process C1F of the Final Reuse Plan and questions public engagement. March JPA used Planning Process C1F to develop the Preferred Land Use Plan outlined in the Final Reuse Plan. The March JPA General Plan was then developed based on that Preferred Land Use Plan. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the project site resulting in 2,172 public notices. Additionally, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative is introduced and evaluated.

FL-E.7 This comment questions the Project's consistency with March JPA General Plan Goal 2, Policies 2.3 and 2.4, which call for discouraging land uses that conflict with the services or plans of adjoining jurisdictions and protecting the interests of local residents and jurisdictions, given the Project's

significant and unavoidable noise and air quality impacts. The Project is consistent with Land Use Element Policy 2.3 because development of the Project would occur in a logical pattern of growth through the guidance of the proposed Specific Plan, compatible with adjacent land uses to the east and northeast. The Conservation Easement will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. The Project is also consistent with Land Use Element Policy 2.4. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution are expressly identified as allowed uses within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of the EIR. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. As detailed in Recirculated Section 4.10, Land Use and Planning, the Project is consistent with the Good Neighbor Guidelines for the County of Riverside, and as detailed in Topical Response 4 – Project Consistency, the Project is generally consistent with the Good Neighbor Guidelines for the City of Riverside.

With respect to noise impacts, as disclosed in Section 4.11, Noise, of the EIR, the Project would not generate substantial temporary or permanent increases in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Segment 13, which passes through industrial development and is a non-sensitive receiving land use, meaning that there are no nearby sensitive receptors, including residential uses. As such, this impact, while significant and unavoidable, would not impact any residential or other sensitive uses in the vicinity of the Project. All Project noise impacts to residential uses would be less than significant.

With regard to air quality impacts, the air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Please see Recirculated Section 4.2, Air Quality, for the revised air quality mitigation measures, Section 4.7, Greenhouse Gas Emissions, for the revised GHG mitigation measures, and Topical Response 2 – Air Quality, for the Project's consistency with the following:

- Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act – Office of the California Attorney General, September 2022
- SCAQMD 2022 Air Quality Management Plan
- U.S. EPA – Mobile Source Pollution: Environmental Justice and Transportation
- World Logistics Center Settlement Agreement Air Quality Measures
- Centerpoint Properties Air Quality Conditions of Approval
- City of Fontana Ordinance 1891 Air Quality Measures

The comment incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

Public benefits provided by the Project would include increased job opportunities for local residents, preservation of open space, extension of the roadway infrastructure and the pedestrian and bicycle circulation system, a new approximately 60-acre public park, and construction of the Meridian Fire Station, at the intersection of Opportunity Way and Meridian Parkway (see Topical Response 6 - Meridian Fire Station, for additional details).

FL-E.8 This comment claims the Project site was never intended to be an industrial zone and references the Final Reuse Plan. The March JPA General Plan implements the Final Reuse Plan and designates the Project site as Business Park, Industrial, and Park/Recreation/Open Space. Under the current General Plan land use designations, 85% of the Project site would be slated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. Please see Recirculated Section 4.10, Land Use and Planning, for further discussion of the Final Reuse Plan and March JPA General Plan.

FL-E.9 This comment references the Final Reuse Plan and the March JPA General Plan and states "warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning." The comment further references the draft update to the March JPA General Plan but this document was never adopted. The March JPA General Plan implements the Final Reuse Plan and designates the Project site as Business Park, Industrial, and Park/Recreation/Open Space. Under the current General Plan land use designations, 85% of the Project site would be slated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. Additionally, under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.

Further, as detailed in Recirculated Section 4.10, Land Use and Planning, the Project is consistent with the Good Neighbor Guidelines for the County of Riverside, and as discussed in Topical Response 4 – Project Consistency, the Project is generally consistent with the Good Neighbor Guidelines for the City of Riverside. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing

trails in the Conservation Easement for passive recreational use. The Project is compatible with the surrounding land uses.

The comment also states that the "West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community input." However, the March JPA General Plan includes warehousing in the definition of Business Park uses. This Business Park definition and the designation of the Project site as Business Park, Industrial, and Park/Recreation/Open Space were included in the March JPA General Plan and Master EIR when it was adopted at a noticed public meeting in 1999. The March JPA General Plan divides land use designations into four general classifications: Industry, Commerce, Special, and Public. Business Park is grouped with Industrial under the Industry classification with the following introduction:

> "Two industrial land use designations are established to complement the aviation and employment generating uses. Due to the location of the March JPA Planning Area within the region, available and· planned street access, and availability of rail service to the area, industrial designations in the Land Use Plan include industrial businesses, and research and development companies as well as large scale manufacturing uses. The land use designations include Industrial and Business Park which will allow for both large and small scale businesses, light manufacturing and assembly, storage, warehousing, research and development and related uses."

Uses allowed under General Plan land use designations are not mutually exclusive. The Industrial land use designation under the General Plan does allow for more intensive uses, such as fuel storage and solid/liquid waste facilities. Please note, however, those uses are not permitted under the proposed Specific Plan. The Master EIR for the March JPA General Plan acknowledged that operations and activities within Business Park could include limited industrial. In addition to warehousing, the Business Park definition includes industrial uses such as light manufacturing and research and development centers. Moreover, wholesale, storage and distribution are expressly identified as allowed uses within the Business Park Zoning District, as identified in the March JPA Development Code. Similar to the March JPA General Plan, the Development Code was adopted and amended in publicly noticed meetings. As discussed in Recirculated Section 4.10, Land Use and Planning, since the adoption of the March JPA General Plan in 1999, the Project site has been designated for development.

FL-E.10 This comment expresses general opposition to the Project and summarizes earlier comments. Please see Responses FL-E.4 through FL-E.9, above.

trails in the Conservation Easement for passive recreational use. The Project is compatible with the surrounding land uses.

The comment also states that the "West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community input." However, the March JPA General Plan includes warehousing in the definition of Business Park uses. This Business Park definition and the designation of the Project site as Business Park, Industrial, and Park/Recreation/Open Space were included in the March JPA General Plan and Master EIR when it was adopted at a noticed public meeting in 1999. The March JPA General Plan divides land use designations into four general classifications: Industry, Commerce, Special, and Public. Business Park is grouped with Industrial under the Industry classification with the following introduction:

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the March JPA General Plan includes warehousing in the definition of Business Park uses. This Business Park definition and the designation of the Project site as Business Park, Industrial, and Park/Recreation/Open Space were included in the March JPA General Plan and Master EIR when it was adopted at a noticed public meeting in 1999. The March JPA General Plan divides land use designations into four general classifications: Industry, Commerce, Special, and Public. Business Park is grouped with Industrial under the Industry classification with the following introduction:

> "Two industrial land use designations are established to complement the aviation and employment generating uses. Due to the location of the March JPA Planning Area within the region, available and· planned street access, and availability of rail service to the area, industrial designations in the Land Use Plan include industrial businesses, and research and development companies as well as large scale manufacturing uses. The land use designations include Industrial and Business Park which will allow for both large and small scale businesses, light manufacturing and assembly, storage, warehousing, research and development and related uses."

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FL-E.10 This comment expresses general opposition to the Project and summarizes earlier comments. Please see Responses FL-E.4 through FL-E.9, above.

9.4.6 Form Letter F Responses to Comments

Comment Letter	Name	Date
Individuals		
I-71	Matt Silveous	2/21/2023
I-76	Karrie Brusselback	2/21/2023
I-84	John Viafora	2/21/2023
I-86	Gayle DiCarlantonio	2/21/2023
I-98	Molly Brooke Becker	2/21/2023
I-101	David Doty	2/22/2023
I-107	Kristy Doty	2/22/2023
I-113	Mark Calhoun	2/22/2023
I-121	DJ Weems	2/22/2023
I-135	Richard Stadler	2/23/2023
I-146	Crystal McCreary	2/24/2023
I-148	Nicolette Rohr	2/24/2023
I-158	Ana Ramirez	2/25/2023
I-160	Vicki Broach	2/25/2023
I-167	Amisha Shah	2/27/2023
I-170	Ajay Shah	2/27/2023
I-174	Andrea Wood	2/27/2023
I-175	Beverly Arias	2/27/2023
I-179	Benjamin Fernandez	2/27/2023
I-191	Chad Smith	2/27/2023
I-195	chrisr3685@yahoo.com	2/27/2023
I-203	chrisr3685@yahoo.com	2/27/2023
I-209	Denette Lemons	2/27/2023
I-212	Donna Stephenson	2/27/2023
I-217	Eunhee Kim	2/27/2023
I-220	Fernando Sosa Jr.	2/27/2023
I-227	Felicia Valencia	2/27/2023
I-228	Gayle DiCarlantonio	2/27/2023
I-230	Joseph Aklufi	2/27/2023
I-240	John W. Hagmann	2/27/2023
I-247	Janet Oien	2/27/2023
I-248	Josie Sosa	2/27/2023
I-259	Kathleen Jump	2/27/2023
I-266	Suzanee Page	2/27/2023
I-278	Michael Dearman	2/27/2023
I-287	Q'Vinc Asberry	2/27/2023
I-295	Richard Arvizu	2/27/2023
I-311	Tony Harkness	2/27/2023
I-317	Tom & Brenda Parkinson	2/27/2023
I-319	Tom & Brenda Parkinson	2/27/2023
I-320	Tom & Brenda Parkinson	2/27/2023
I-321	Ying Shen	2/27/2023
I-325	amaharris12@gmail.com	2/28/2023

Comment Letter	Name	Date
Individuals		
I-328	Ann & Dolores Marchand	2/28/2023
I-337	Jennifer Zamora	2/28/2023
I-344	Karen Bartell	2/28/2023
I-353	K Doty	2/28/2023
I-356	Luis Rodriguez	2/28/2023
I-367	Susan Fahrney	2/28/2023
I-377	Drew Ward	2/28/2023
I-379	Drew Ward	2/28/2023
I-386	Francine Carbajal	2/28/2023
I-392	Gabriella Zlaket	2/28/2023
I-394	Bobby Robinette	3/1/2023
I-401	Cynthia Spring-Pearson	3/1/2023
I-409	Jennifer Hernandez	3/1/2023
I-415	Leslie Tamppari	3/1/2023
I-418	Maria Estabrooks	3/1/2023
I-434	Senanu Spring-Pearson	3/1/2023
I-435	Carlos Lliguin	3/2/2023
I-436	Carlos Lliguin	3/2/2023
I-442	Chyee Wang	3/2/2023
I-447	Kristin Fyfe	3/2/2023
I-452	Peter Pettis	3/2/2023
I-465	Aaron Bushong	3/3/2023
I-469	Annabelle Porter	3/3/2023
I-476	Ofelia Bobadilla	3/3/2023
I-477	Chris Shearer	3/4/2023
I-480	Don Morris	3/4/2023
I-488	Leo Bobadilla	3/4/2023
I-490	Amy Litt	3/5/2023
I-497	Christopher Gate	3/5/2023
I-500	Christopher Gate	3/5/2023
I-505	Danela Jimenez	3/5/2023
I-507	Dr. Christian Craddock	3/5/2023
I-510	Elise Estrella-Hahn	3/5/2023
I-522	George Harvilla	3/5/2023
I-529	John & Mary Viafora	3/5/2023
I-534	Joe Aklufi	3/5/2023
I-550	Ryan Joseph	3/5/2023
I-562	Tia Ballesteros	3/5/2023
I-567	Anthony Musumba	3/5/2023
I-577	Brady Goodson	3/6/2023
I-578	Christine Martin	3/6/2023
I-580	Felix & Felicia Valencia	3/6/2023
I-594	Linda Tingley	3/6/2023
I-595	Milo Rivera	3/6/2023
I-596	Maria Rodriguez	3/6/2023

Comment Letter	Name	Date
Individuals		
I-600	Tim Martin	3/6/2023
I-605	Jenna Pontious	3/7/2023
I-609	Mark and Jennifer Sullivan	3/7/2023
I-616	Mark and Jennifer Sullivan	3/7/2023
I-628	Michelle Singleton	3/7/2023
I-637	Rosario Garcia	3/7/2023
I-644	Stephanie Jimenez	3/7/2023
I-687	Abigail Banning	3/9/2023
I-695	Amber Peaslee	3/9/2023
I-713	Allison Bushong	3/9/2023
I-726	Cynthia Jessen	3/9/2023
I-740	Clay Muehls	3/9/2023
I-748	David Doty	3/9/2023
I-767	Freddie Quintana	3/9/2023
I-797	Kyle Warsinski	3/9/2023
I-804	Leslie Bushong	3/9/2023
I-819	Mark Jessen	3/9/2023
I-850	Ronald Peters	3/9/2023
I-866	Sally Quintana	3/9/2023
I-880	Abdallah Karim	3/10/2023
I-899	Andrew Silva	3/10/2023
I-909	Collete Lee	3/10/2023
I-912	Christopher Nielsen	3/10/2023
I-915	Carolina R	3/10/2023
I-922	Honey Bernas	3/10/2023
I-941	Pete Elliot	3/10/2023
I-959	Veronica Juarez	3/10/2023

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Form Letter F

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. F-1.1 F-1.2 F-1.3

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have. F-1.4

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16? F-1.5 F-1.6 F-1.7 F-1.8

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate. F-1.9

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. F-1.10

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers. F-1.11

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional

warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

E-1.11 Cont.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

E-1.12

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

E-1.13

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

E-1.14

Form Letter F Response – Jobs

FL-F.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total buildout of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

FL-F.2 This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required.

FL-F.3 This comment requests a non-industrial alternative to the Project. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated.

FL-F.4 This comment questions the Project's estimated job generation. The Draft EIR utilizes the Project jobs estimate of 2,595 employees used by Western Municipal Water District (WMWD) in its Water Supply Assessment (Appendix O) for the Project. As discussed in Topical Response 5 – Jobs, the Project on-site employee estimate included within the Draft EIR does not include ancillary jobs. The Project would generate ancillary jobs for approximately 1,027 truck drivers based on the Project truck trip generation. When the Project's estimated truck drivers (1,027) are added to the Project's estimated on-site employees (2,595), the Project has an estimate of 3,622 total jobs generated. The Project's combined jobs estimate of 3,622 conservatively exceeds the March JPA employment ratio estimate (of 3,357) by only 8%, or 265 jobs.

FL-F.5 This comment states the Draft EIR's GHG section claims the Project would have a net positive effect because of reductions in commute times. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), contrary to this comment's suggestion, Section 4.7 of the Draft EIR does not conclude that the Project would have a net positive effect on GHG emissions but rather concludes that with implementation of mitigation measures, the proposed Project would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. As such, with mitigation the Project would be expected to have a less than significant impact with regard to GHG emissions but would not result in a net reduction in GHG emissions.

FL-F.6 This comment questions employment wages in relation to area rental rates. This comment does not raise questions, concerns, or issues regarding the environmental analysis in the EIR. Please see Topical Response 5 – Jobs, for a discussion of the regional unemployment, wages, and housing costs.

FL-F. 7 This comment questions the Draft EIR's employment assumptions. Please see Topical Response 5 – Jobs, for a discussion of the Project's job generation and employment assumptions. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), Goal 5 of Connect SoCal is to reduce greenhouse gas emissions and improve air quality. To meet that goal, "Connect SoCal includes a sustainable communities strategy which sets forth a forecasted development pattern

for the region, which, when integrated with the transportation network, and other transportations measures and policies, if implemented, will reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by ARB for the SCAG region." The forecasted development pattern is based on a regional growth forecast that was developed by working with local jurisdictions using the most recent land use plans and policies and planning assumptions.[1]

SCAG explicitly found that "For the purpose of determining consistency with Connect SoCal for California Environmental Quality Act (CEQA), grants or other opportunities, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency." Connect SoCal p. xiv. March JPA determines consistency with Connect SoCal based on consistency with the long-term employment and growth projections. The SCS also indicates that this is a jobs poor area so providing more jobs will actually reduce GHG emissions and reduce VMT as it will provide local jobs to achieve a more favorable jobs-housing balance.

The proposed Project is consistent with the long-term employment and growth projections used by SCAG in the RTP/SCS and is therefore consistent with Connect SoCal. Moreover, the Project does not impede implementation of improvements to the transportation network, and other transportations measures and policies. Therefore, the Project would be consistent with the SCAG's goal to "reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by ARB for the SCAG region."

FL-F.8 This comment questions why the traffic models assumed a 16-mile commute rather than a 21-mile commute. The comment appears to misinterpret the information presented in the Draft EIR on page 4.2-23. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4 of the Final EIR), the discussion notes that for passenger vehicles, the historic CalEEMod default for the trip length is approximately 16.6 miles – however for analytical purposes, the CalEEMod 2022 model defaults were utilized which identify a weighted average of approximately 20 miles. Therefore, contrary to the comment's assertion, the traffic model did not assume 21-mile commutes would be shortened to 16 miles.

FL-F.9 This comment requests that the EIR include data about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. This request does not raise any questions, concerns, or issues about the environmental analysis in the EIR. Please see Topical Response 5 – Jobs, for a discussion of the regional unemployment, wages, and housing costs.

FL-F.10 This comment says that the number of approved and planned warehouses in the region exceeds the number of available employees in the region and provides a link to the City of Riverside's economic development data. As discussed in Topical Response 5 – Jobs, Project buildout would occur over an approximately 5-year horizon. The employment growth projections (i.e., forecasts) utilized within the Draft EIR are provided by each local jurisdiction (e.g., Riverside County, City of Riverside, City of Moreno Valley, City of Perris) to the Southern California Association of Governments (SCAG) and based on the anticipated growth in population in Riverside County during the near-term (projected increase of 360,000 new County residents by 2030) and long-term (projected increase of 759,000 new County residents by 2045). As such, additional jobs will be needed to continue to provide employment

1 https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020

opportunities for future residents of Riverside County. The Draft EIR cites SCAG data in which, "48.6% of residents within unincorporated Riverside County work and live in the County, while 51.4% commute outside of the County (SCAG 2019b)". SCAG identified similar trends for Riverside County as a whole (inclusive of the incorporated and unincorporated areas). Approximately 48.0% work and live in Riverside County, while 52.0% commute to other places (SCAG 2019a). Further, as discussed in the General Plan, March JPA was formed to create jobs within this portion of Riverside County as part of the March Air Reserve Base realignment. Therefore, it is reasonable to assume the jobs generated by the Project could be filled with existing local residents residing within the County, either from the unemployed population or residents looking to reduce their commutes. The comment identifies a jobs/acre rate of 8.8 but does not provide any citation to support this rate.

FL-F.11 This comment provides speculation regarding regional employment and provides a link to the Draft EIR for the World Logistics Center. Please see Response FL-F.10, above. Contrary to this comment's suggestion, the Draft EIR does not use VMT/employee estimates indicating shorter commutes. As discussed in Section 4.15, Transportation, of the Draft EIR, mixed-use projects such as the proposed Project need to evaluate each component of the Project independently and apply the relevant significance threshold for each Project type (e.g., office, retail). As an alternative, a lead agency may choose to evaluate the Project's dominant use. For the purposes of proposed Project's VMT analysis, the dominant uses retail and non-retail (i.e., employment uses such as office, business park, and non-retail mixed use) were considered.

For large projects such as the proposed Project, model-based approach (tour- or trip- based travel demand models) offer the best methods for assessing VMT and for comparing those assessments to VMT thresholds. WRCOG Guidelines identifies Riverside County Transportation Demand Model (RIVCOM) as the appropriate tool for conducting VMT analysis for land development projects in the March JPA planning area. WRCOG is the developer/owner of RIVCOM and recently launched the new modeling tool for use by its member agencies in August 2021. The Project's VMT analysis was prepared using the latest available version of model, i.e., RIVCOM Version 3.0. The RIVCOM is a trip-based model that has been developed using Southern California Association of Governments (SCAG) Sub-Regional Model Development Tool.

As stated in OPR's Technical Advisory for evaluating VMT impacts, "Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential and retail)." Consistent with OPR's direction in the Technical Advisory, the VMT metric for retail projects greater than 50,000 sf of gross leasable area is to utilize the metric of net change in total VMT. Therefore, for purposes of this analysis, a significant impact to VMT would occur if the addition of the Project's retail component would result in a net increase in total VMT for the region. For purposes of the Project's VMT analysis, the region is defined as a 15-mile service area from the Project site. A 15-mile service area is a conservatively estimated distance from the Project as the retail component is not anticipated as a regional shopping destination but instead is anticipated to serve the surrounding communities of Riverside, Moreno Valley, Perris, etc. As such, the 15-mile service area ONLY applies to the retail component of the Project and not the Business Park and Industrial components of the Project.

For projects that are not residential or retail land use types, the Technical Advisory identifies VMT per employee as the appropriate VMT metric for analysis. Therefore, the Project's industrial, business park, and non-retail mixed use land uses were evaluated based on the metric of VMT per employee. A significant

impact to VMT would occur if the addition of the Project's industrial/business park/non-retail mixed use components would result in Project-generated VMT per employee to exceed 15% below the WRCOG's baseline VMT. This specifically applies to the non-retail components of the proposed Project.

As shown in Table 4.15-6, Specific Plan Area Non-Retail VMT per Employee Comparison, the regional average VMT in the Western Riverside County area is 29.97 vehicle miles traveled per employee. Under the VMT significance thresholds, a significant impact to VMT would occur if the addition of the Project's industrial/business park/non-retail mixed use components would result in Project-generated VMT per employee to exceed 15% below the WRCOG's baseline VMT, which is 25.47 vehicle miles traveled per employee. Again, this specifically applies to the non-retail components of the proposed Project. As calculated in the West Campus Upper Plateau Vehicle Miles Traveled (VMT) Analysis dated October 11, 2022 (Appendix N-2), and as shown in Table 4.15-6 of the Draft EIR, the Project's VMT would be 24.12, which is less than the established threshold of 25.47 vehicle miles traveled.

FL-F.12 This comment questions the impact of automation and electric vehicle purchases in relation to GHG analysis. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. Additionally, it is speculative to assume transition to an electric personal vehicle fleet. Any future automobile electrification will reduce air and GHG emissions such that the emissions disclosed by the Draft EIR are conservative.

FL-F.13 This comment requests that estimates be made using actual job/population/housing estimates from the last 3 months rather than "7-year-old SCAG projections." Per SCAG's "Current Context, Demographics and Growth Forecast Technical Report, adopted on September 3, 2020, "The regional and county growth forecasts reflect recent and past trends and expert-derived demographic and economic assumptions. As part of the development of the forecast, SCAG met one-on-one with all 197 local jurisdictions to understand each community's vision for the future so that it can be integrated into the outlook for the future of the region. This "best of both worlds" approach ensures the forecast reflects a balance between regional and local expertise as well as a balance between future employment, population and households."[2] As such, it is appropriate to use SCAG numbers, which take into account past trends, the current situation, and projections from all 197 local jurisdictions (including County of Riverside, City of Riverside, City or Moreno Valley and City of Perris) within the SCAG region.

FL-F.14 This comment requests that single-family residential be considered as an alternative to the Project. Please see Topical Response 8 – Alternatives, where a discussion is provided about the infeasibility of a single-family residential alternative.

2 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579, page 1. Accessed July 12, 2023.

9.4.7 Form Letter G Responses to Comments

Comment Letter	Name	Date
Individuals		
I-77	Juan Garcia	2/21/2023
I-81	John Viafora	2/21/2023
I-94	Melissa Suarez	2/21/2023
I-108	Kristy Doty	2/22/2023
I-110	Mark Calhoun	2/22/2023
I-118	DJ Weems	2/22/2023
I-99	David Doty	2/22/2023
I-137	Crystal McCreary	2/24/2023
I-157	Ana Ramirez	2/25/2023
I-164	K Doty	2/26/2023
I-168	Amisha Shah	2/27/2023
I-171	Ajay Shah	2/27/2023
I-176	Beverly Arias	2/27/2023
I-180	Benjamin Fernandez	2/27/2023
I-188	Chad Smith	2/27/2023
I-192	Chad Smith	2/27/2023
I-196	chrisr3685@yahoo.com	2/27/2023
I-206	David Denarola	2/27/2023
I-208	Denette Lemons	2/27/2023
I-215	Eunhee Kim	2/27/2023
I-221	Fernando Sosa Jr.	2/27/2023
I-229	Gette Kell	2/27/2023
I-231	Joseph Aklufi	2/27/2023
I-237	John W. Hagmann	2/27/2023
I-246	Janet Oien	2/27/2023
I-249	Josie Sosa	2/27/2023
I-260	Kathleen Jump	2/27/2023
I-267	Suzanee Page	2/27/2023
I-273	Kathleen Renick	2/27/2023
I-276	Michael Dearman	2/27/2023
I-282	Maria Rodriguez	2/27/2023
I-292	Q'Vinc Asberry	2/27/2023
I-294	Richard Arvizu	2/27/2023
I-296	Richard Arvizu	2/27/2023
I-302	Roger Reaney	2/27/2023
I-306	Sean Walsh	2/27/2023
I-309	Tanya Ayon	2/27/2023
I-310	Tony Harkness	2/27/2023
I-318	Tom and Brenda Parkinson	2/27/2023
I-327	amaharris12@gmail.com	2/28/2023
I-329	Ann and Dolores Marchand	2/28/2023
I-338	Jennifer Zamora	2/28/2023
I-345	Karen Bartell	2/28/2023

Comment Letter	Name	Date
Individuals		
I-352	Kevin Carney	2/28/2023
I-355	Luis Rodriguez	2/28/2023
I-364	Nancy Magi	2/28/2023
I-371	Berenice Dixon	2/28/2023
I-380	Drew Ward	2/28/2023
I-388	Francine Carbajal	2/28/2023
I-390	Gisela and Nelson Cuellar	2/28/2023
I-395	Bobby Robinette	3/1/2023
I-402	Cynthia Spring-Pearson	3/1/2023
I-416	Lori Nelson	3/1/2023
I-424	Maria Estabrooks	3/1/2023
I-427	Rosenberg Alfaro	3/1/2023
I-433	Senanu Spring-Pearson	3/1/2023
I-437	Carlos Lliguin	3/2/2023
I-441	Chyee Wang	3/2/2023
I-443	Ginette Lillibridge	3/2/2023
I-446	Kristin Fyfe	3/2/2023
I-453	Peter Pettis	3/2/2023
I-463	Aaron Bushong	3/3/2023
I-470	Annabelle Porter	3/3/2023
I-481	Don Morris	3/4/2023
I-491	Amy Litt	3/5/2023
I-501	Christopher Gate	3/5/2023
I-502	Christine Heinemann	3/5/2023
I-506	Danela Jimenez	3/5/2023
I-509	Elise Estrella-Hahn	3/5/2023
I-516	Gayle DiCarlantonio	3/5/2023
I-526	Greg Russell	3/5/2023
I-528	Greg Renne	3/5/2023
I-532	Jean Aklufi	3/5/2023
I-535	Joe Aklufi	3/5/2023
I-543	Mary Harris	3/5/2023
I-549	Ryan Joseph	3/5/2023
I-556	Sara Amend	3/5/2023
I-560	Tia Ballesteros	3/5/2023
I-568	Anthony Musumba	3/5/2023
I-569	Armendina Leyva	3/6/2023
I-581	Felix and Felicia Valencia	3/6/2023
I-589	Jason Gonsman	3/6/2023
I-590	Ken Renne	3/6/2023
I-592	Larry Iest	3/6/2023
I-606	Jenna Pontious	3/7/2023
I-608	Linda Tingley	3/7/2023
I-620	Michele Muehls	3/7/2023
I-626	Milo Rivera	3/7/2023

Comment Letter	Name	Date
Individuals		
I-629	Michelle Singleton	3/7/2023
I-638	Rosario Garcia	3/7/2023
I-645	Stephanie Jimenez	3/7/2023
I-654	Avery Cintura	3/8/2023
I-661	Kristy Doty	3/8/2023
I-665	Kristy Doty	3/8/2023
I-676	Shaan Saigol	3/8/2023
I-680	Victoria Belova	3/8/2023
I-684	Anza Akram	3/9/2023
I-686	Abigail Banning	3/9/2023
I-696	Amber Peaslee	3/9/2023
I-711	Allison Bushong	3/9/2023
I-727	Cynthia Jessen	3/9/2023
I-738	Clay Muehls	3/9/2023
I-749	David Doty	3/9/2023
I-768	Freddie Quintana	3/9/2023
I-801	Leslie Bushong	3/9/2023
I-820	Mark Jessen	3/9/2023
I-849	Raquel Ortiz	3/9/2023
I-851	Ronald Peters	3/9/2023
I-867	Sally Quintana	3/9/2023
I-881	Abdallah Karim	3/10/2023
I-889	Abdallah Karim	3/10/2023
I-900	Andrew Silva	3/10/2023
I-907	Cindy Chiek	3/10/2023
I-932	Nicole Bernas	3/10/2023
I-953	Rosamonde Cook, Ph.D.	3/10/2023
I-960	Veronica Juarez	3/10/2023

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Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. FL-G.1 FL-G.2 FL-G.3

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? FL-G.4

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

I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. FL-G.5

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? FL-G.6 FL-G.7

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. FL-G.8

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you! FL-G.9

Form Letter G Response – Traffic

FL-G.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

FL-G.2 This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required.

FL-G.3 This comment requests a non-industrial alternative to the Project. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated.

FL-G.4 This comment expresses concerns about the traffic relative to the 215 Freeway and the 215/60 corridor, cumulative projects, and roadway segment and intersection analysis.

I-215 Freeway and 215/60 Corridor

As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), March JPA has adopted its own guidelines for traffic analysis: the March JPA Traffic Impact Study Guidelines, dated February 10, 2020 (March JPA Guidelines). As March JPA is the lead agency for this Project, the Project Traffic Analysis (Appendix N-2) was developed pursuant to the March JPA Guidelines, rather than the WRCOG or County of Riverside Transportation Planning guidance documents. Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. As such, Caltrans does not utilize peak hour intersection operations analysis and instead utilizes vehicle miles traveled (VMT) in compliance with SB 743 through its VMT-Focused Transportation Impact Study Guide (Caltrans VMT Guide), dated May 20, 2020. The March JPA Guidelines were adopted before the Caltrans VMT Guide and reference superseded Caltrans guidance. The Project VMT Analysis (Appendix N-1) was prepared in compliance with the Caltrans VMT Guide and meets the transportation analysis requirement for Caltrans. Caltrans was notified about the Project through the release of the Notice of Preparation on November 18, 2021. Caltrans also received the Notice of Availability for the Draft EIR when the document was circulated for public review beginning on January 9, 2023. No comments were provided by Caltrans during the scoping period or public review for the Project.

Pursuant to Caltrans safety requirements, the Project Traffic Analysis (Appendix N-2) included an assessment of the I-215 off-ramps at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard to ensure there is no queuing, or back-up, onto the freeway mainline. These I-215 off-ramps were selected because the Project is anticipated to contribute 50 or more peak hour trips to these off-ramp intersections, consistent with the March JPA Guidelines. The Project Traffic Analysis (Appendix N-2)

performed a queuing analysis for these I-215 Freeway off-ramps for all scenarios (Existing [2021], Existing plus Project, Existing plus Ambient Growth plus Project, Opening Year [2028] Cumulative Without Project, Opening Year [2028] With Project, Horizon Year [2045] Without Project, and Horizon Year [2045] With Project). Based on the results of this queuing analysis, there are no study area off-ramps that are anticipated to experience queuing issues under any scenario. Caltrans is one of the state reviewing agencies for the Project and had the opportunity to comment on the transportation analysis. https://ceqanet.opr.ca.gov/2021110304. Caltrans did not submit any comments on this Project.

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

To address identified intersection/roadway segment deficiencies, Table 1-4 of the Project Traffic Analysis (Appendix N-2) recommends off-site improvements and the Project's fair share contribution thereto. PDF-TRA-4 requires the Project to contribute its fair share as shown in Table 1-4. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. For each analyzed scenario, the Project Traffic Analysis (Appendix N-2) discloses conditions "Without Improvements" and conditions "With Improvements."

Cumulative Projects

As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), to ensure that the Project Traffic Analysis (Appendix N-2) satisfied the March JPA Guidelines, Urban Crossroads, Inc. prepared a Project traffic analysis scoping package for review by March JPA staff prior to the preparation of the Project Traffic Analysis (Appendix N-2). The December 22, 2021 scoping agreement provides an outline of the Project study area, trip generation, trip distribution, analysis methodology, and cumulative project list and map. The agreement is included in Appendix 1.1 of Project Traffic Analysis (Appendix N-2). The scoping agreement was also shared with the County of Riverside, City of Riverside, and City of Moreno Valley for review and comment, and those comments were taken into consideration as part of the Project Traffic Analysis (Appendix N-2). The scoping agreement expressly requested the agencies provide the latest cumulative projects.

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

The Project Traffic Analysis (Appendix N-2) included cumulative development projects within 5 miles of the Project site that were known at the time of the Project Notice of Preparation, dated November 18, 2021. Both the Stoneridge and World Logistics Center projects are just over 8-miles from the Project site. The Project Traffic Analysis (Appendix N-2) cumulative list was developed in coordination with and reviewed by March JPA, City of Riverside, City of Moreno Valley, and County of Riverside.

Smaller projects and projects located a greater distance from the Project, such as Stoneridge and World Logistics Center, are accounted for through the application of the ambient growth factor. The Project Traffic Analysis (Appendix N-2) added an ambient growth factor of 14.87%[1] to existing (2021) traffic volumes for Opening Year (2028) Cumulative conditions in addition to traffic manually added to account for the listed cumulative projects and proposed Project. Cumulative traffic for Horizon Year (2045) conditions is based on the Riverside County Model (RIVCOM) (a traffic model representing 2045 conditions for the Western Riverside County region), which includes traffic associated with projects such as Stoneridge and World Logistics Center.

Roadway Segment and Intersection Analysis

As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project Traffic Analysis (Appendix N-2) analyzed the Project's effects on traffic on truck routes, other roadways, and intersections located within March JPA, City of Riverside, City of Moreno Valley, and County of Riverside. The scope of the study area was based on input provided by March JPA, the City of Riverside, City of Moreno Valley, and County of Riverside. Study area intersections at a minimum include locations where the Project would contribute 50 or more peak hour trips (consistent with the minimum standards used by these same agencies). This Project Traffic Analysis (Appendix N-2) included 15 roadway segments (see Table 1-2), including 9 truck route segments, and 38 intersections (see Table 1-1 and Exhibit 1-2), including eight intersections along Alessandro Boulevard, and seven intersections along Van Buren Boulevard. Urban Crossroads, Inc. worked closely with these agencies to determine travel patterns for Project traffic, including truck traffic. As shown on Exhibits 4-1 and 4-2 of Appendix N-2, Project traffic is not anticipated to utilize Krameria Avenue in any substantial way. The Project Traffic Analysis (Appendix N-2) conforms to the March JPA Guidelines and the 2021 scoping agreement.

FL-G.5 This comment expresses concerns about traffic on arterial streets, trucks not following the approved truck routes, and questions what enforcement mechanisms will be used to mitigate traffic. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue to the east. Under PDF-TRA-1, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Section

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

4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

FL-G.6 This comment asks who will ensure that mitigation measures are followed when March JPA sunsets. In response to this comment, please see Topical Response 9 – Long-Term Project Implementation and Enforcement.

FL-G.7 This comment questions how the traffic study would change in actual (versus "ideal") traffic patterns of truck drivers were taken into account. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), traffic studies provide the best representation of anticipated traffic flows and volumes and are based on data gathered from existing developments and local conditions. The models used are routinely revised to incorporate updated information.

As required by Section 5.5.4 of the March JPA Guidelines, Urban Crossroads prepared figures illustrating the percentage of Project peak hour traffic going to and from various destinations along the transportation network. As stated in the 2021 scoping agreement:

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

Appendix N-2. At the request of March JPA, passenger car and truck trip distributions are consistent with other March JPA projects within the immediate vicinity. The trip distribution figures were shared with the County of Riverside, City of Riverside, and City of Moreno Valley as part of the scoping agreement for review and comment, and those comments were taken into consideration as part of the Project Traffic Analysis (Appendix N-2).

Charlene So P.E., of Urban Crossroads has worked in transportation planning and traffic engineering since 2002. Since earning her Bachelor of Science degree in Civil Engineering from the University of California, Irvine, Ms. So has developed a wide range of expertise in transportation planning and traffic impact analyses. She is a registered professional traffic engineer in the State of California. Ms. So is

an experienced project manager leading the traffic group and traffic engineer who is familiar with the analysis techniques of the most current Highway Capacity Manual. Further, March JPA, the County of Riverside, City of Riverside, and City of Moreno Valley are experts with regards to traffic flow and patterns within their jurisdictions.

Regarding truck route enforcement, please see Response FL-G.5, above.

FL-G.8 This comment questions existing truck route compliance and burden of enforcement. Regarding truck route enforcement, please see Response FL-G.5, above.

FL-G.9 This comment requests that the traffic study be redone to reflect actual conditions. Based on the Responses FL-G.1 through FL-G.8 above, the traffic study does not require any revisions or additional analysis to reflect actual conditions. No further response is provided.

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9.5 Individual Responses to Comments

Comment Letter	Name	Date
Individuals		
I-1	Mary Ann Ruiz	1/9/2023
I-2	Jen Larratt Smith	1/10/2023
I-3	Jen Larratt Smith	1/10/2023
I-4	Jen Larratt Smith	1/10/2023
I-5	Jen Larratt Smith	1/10/2023
I-6	Jen Larratt Smith	1/10/2023
I-7	Mike McCarthy	1/10/2023
I-8	Mike McCarthy	1/10/2023
I-9	Robert Walker	1/10/2023
I-10	Jerry Shearer Jr.	1/14/2023
I-11	Jerry Shearer Jr.	1/30/2023
I-12	Jerry Shearer Jr.	2/5/2023
I-13	Mary Viafora	2/6/2023
I-14	Fernando Sosa Jr.	2/6/2023
I-15	David Divani	2/6/2023
I-16	Christian Craddock	2/6/2023
I-17	Victoria Belova	2/6/2023
I-18	Susan Nipper	2/6/2023
I-19	Rick Lloyd	2/6/2023
I-20	Ana Ramirez	2/6/2023
I-21	Carlos Lliguin	2/6/2023
I-22	Anthony Scimia Jr.	2/6/2023
I-23	Bobby Robinette	2/7/2023
I-24	Berenice Dixon	2/7/2023
I-25	Ajay Shah	2/7/2023
I-26	Abigail Banning	2/7/2023
I-27	Aaron Bushong	2/7/2023
I-28	John Hagmann	2/7/2023
I-29	Jean Aklufi	2/7/2023
I-30	Joseph Aklufi	2/7/2023
I-31	Jodi Mullarky	2/7/2023
I-32	Jerry Shearer Jr.	2/7/2023
I-33	Jason Gonsman	2/7/2023
I-34	Janice Oien	2/7/2023
I-35	Lenora Mitchell	2/7/2023
I-36	Kristy Doty	2/7/2023
I-37	Karen Bartell	2/7/2023
I-38	Juan Garcia	2/7/2023
I-39	Josie Sosa	2/7/2023
I-40	John and Mary Viafora	2/7/2023
I-41	John Hathaway	2/7/2023
I-42	Christine Heinemann	2/7/2023

Comment Letter	Name	Date
Individuals		
I-43	Chris Hannon	2/7/2023
I-44	Chad Smith	2/7/2023
I-45	Brian Wardle	2/7/2023
I-46	Gerardo Arenas	2/7/2023
I-47	George Harvilla	2/7/2023
I-48	Eunhee Kim	2/7/2023
I-49	Elizabeth Wexler	2/7/2023
I-50	Elisa Estrella-Hahn	2/7/2023
I-51	Denette Lemons	2/7/2023
I-52	Melissa Suarez	2/7/2023
I-53	Viviane Baerenklau	2/7/2023
I-54	Veronica Juarez	2/7/2023
I-55	Kelley Page	2/7/2023
I-56	Susana Balmer	2/7/2023
I-57	Sara Amend	2/7/2023
I-58	Richard Stadler	2/7/2023
I-59	Peter Pettis	2/7/2023
I-60	Nicole-Lynn Bernas	2/7/2023
I-61	Nancy Magi	2/7/2023
I-62	Michele Muehls	2/7/2023
I-63	Melody Clark	2/7/2023
I-64	Matt Silveous	2/7/2023
I-65	Shaan Saigol	2/7/2023
I-66	Sergio Salazar	2/7/2023
I-67	Steve Balmer	2/8/2023
I-68	Mike McCarthy	2/8/2023
I-69	Linda Tingley	2/10/2023
I-70	Sylvia Melgoza	2/17/2023
I-71	Matt Silveous	2/21/2023
I-72	Matt Silveous	2/21/2023
I-73	Matt Silveous	2/21/2023
I-74	Karrie Brusselback	2/21/2023
I-75	Karrie Brusselback	2/21/2023
I-76	Karrie Brusselback	2/21/2023
I-77	Juan Garcia	2/21/2023
I-78	John Viafora	2/21/2023
I-79	John Viafora	2/21/2023
I-80	John Viafora	2/21/2023
I-81	John Viafora	2/21/2023
I-82	John Viafora	2/21/2023
I-83	John Viafora	2/21/2023
I-84	John Viafora	2/21/2023
I-85	John McCalley	2/21/2023
I-86	Gayle DiCarlantonio	2/21/2023
I-87	Erin Conlisk	2/21/2023

Comment Letter	Name	Date
Individuals		
I-88	Erin Lehman	2/21/2023
I-89	Erin Lehman	2/21/2023
I-90	Frank Erdodi	2/21/2023
I-91	Frank Erdodi	2/21/2023
I-92	Melissa Suarez	2/21/2023
I-93	Melissa Suarez	2/21/2023
I-94	Melissa Suarez	2/21/2023
I-95	Melissa Suarez	2/21/2023
I-96	Melissa Suarez	2/21/2023
I-97	Molly Brooke Becker	2/21/2023
I-98	Molly Brooke Becker	2/21/2023
I-100	David Doty	2/22/2023
I-101	David Doty	2/22/2023
I-102	Kristy Doty	2/22/2023
I-103	Kristine Doty	2/22/2023
I-104	Kristy Doty	2/22/2023
I-105	Kristy Doty	2/22/2023
I-106	Kristy Doty	2/22/2023
I-107	Kristy Doty	2/22/2023
I-108	Kristy Doty	2/22/2023
I-109	Kristine Doty	2/22/2023
I-110	Mark Calhoun	2/22/2023
I-111	Mark Calhoun	2/22/2023
I-112	Mark Calhoun	2/22/2023
I-113	Mark Calhoun	2/22/2023
I-114	Mark Calhoun	2/22/2023
I-115	Mark Calhoun	2/22/2023
I-116	Mark Calhoun	2/22/2023
I-117	Beth West	2/22/2023
I-118	DJ Weems	2/22/2023
I-119	DJ Weems	2/22/2023
I-120	DJ Weems	2/22/2023
I-121	DJ Weems	2/22/2023
I-122	DJ Weems	2/22/2023
I-123	DJ Weems	2/22/2023
I-124	DJ Weems	2/22/2023
I-99	David Doty	2/22/2023
I-125	David Doty	2/23/2023
I-126	David Doty	2/23/2023
I-127	David Doty	2/23/2023
I-128	David Doty	2/23/2023
I-129	Kristy Doty	2/23/2023
I-130	Kristy Doty	2/23/2023
I-131	K Doty	2/23/2023
I-132	Kristy Doty	2/23/2023

Comment Letter	Name	Date
Individuals		
I-133	Nicolette Rohr	2/23/2023
I-134	Richard Stadler	2/23/2023
I-135	Richard Stadler	2/23/2023
I-136	Tom Parkinson	2/23/2023
I-137	Crystal McCreary	2/24/2023
I-138	Crystal McCreary	2/24/2023
I-139	Crystal McCreary	2/24/2023
I-140	Crystal McCreary	2/24/2023
I-141	Crystal McCreary	2/24/2023
I-142	Crystal McCreary	2/24/2023
I-143	Crystal McCreary	2/24/2023
I-144	Crystal McCreary	2/24/2023
I-145	Crystal McCreary	2/24/2023
I-146	Crystal McCreary	2/24/2023
I-147	Natalie Gravitt	2/24/2023
I-148	Nicolette Rohr	2/24/2023
I-149	Nicolette Rohr	2/24/2023
I-150	Nicolette Rohr	2/24/2023
I-151	Nicolette Rohr	2/24/2023
I-152	Ana Ramirez	2/25/2023
I-153	Ana Ramirez	2/25/2023
I-154	Ana Ramirez	2/25/2023
I-155	Ana Ramirez	2/25/2023
I-156	Ana Ramirez	2/25/2023
I-157	Ana Ramirez	2/25/2023
I-158	Ana Ramirez	2/25/2023
I-159	Mary Viafora	2/25/2023
I-160	Vicki Broach	2/25/2023
I-161	Araceli Anaya	2/26/2023
I-162	George Harvilla	2/26/2023
I-163	Kristy Doty	2/26/2023
I-164	K Doty	2/26/2023
I-165	Mohsen Lesani	2/26/2023
I-166	Ronald Peters	2/26/2023
I-167	Amisha Shah	2/27/2023
I-168	Amisha Shah	2/27/2023
I-169	Amisha Shah	2/27/2023
I-170	Ajay Shah	2/27/2023
I-171	Ajay Shah	2/27/2023
I-172	Ajay Shah	2/27/2023
I-173	Ajay Shah	2/27/2023
I-174	Andrea Wood	2/27/2023
I-175	Beverly Arias	2/27/2023
I-176	Beverly Arias	2/27/2023
I-177	Belle Chang	2/27/2023

Comment Letter	Name	Date
Individuals		
I-178	Belle Chang	2/27/2023
I-179	Benjamin Fernandez	2/27/2023
I-180	Benjamin Fernandez	2/27/2023
I-181	Benjamin Fernandez	2/27/2023
I-182	Benjamin Fernandez	2/27/2023
I-183	Benjamin Fernandez	2/27/2023
I-184	Benjamin Fernandez	2/27/2023
I-185	Benjamin Fernandez	2/27/2023
I-186	Brian Wardle	2/27/2023
I-187	Christian Clark	2/27/2023
I-188	Chad Smith	2/27/2023
I-189	Chad Smith	2/27/2023
I-190	Chad Smith	2/27/2023
I-191	Chad Smith	2/27/2023
I-192	Chad Smith	2/27/2023
I-193	Chad Smith	2/27/2023
I-194	Chad Smith	2/27/2023
I-195	chrisr3685@yahoo.com	2/27/2023
I-196	chrisr3685@yahoo.com	2/27/2023
I-197	chrisr3685@yahoo.com	2/27/2023
I-198	chrisr3685@yahoo.com	2/27/2023
I-199	chrisr3685@yahoo.com	2/27/2023
I-200	chrisr3685@yahoo.com	2/27/2023
I-201	chrisr3685@yahoo.com	2/27/2023
I-202	chrisr3685@yahoo.com	2/27/2023
I-203	chrisr3685@yahoo.com	2/27/2023
I-204	Denise Carlson	2/27/2023
I-205	David Denarola	2/27/2023
I-206	David Denarola	2/27/2023
I-207	Denette Lemons	2/27/2023
I-208	Denette Lemons	2/27/2023
I-209	Denette Lemons	2/27/2023
I-210	Denette Lemons	2/27/2023
I-211	Denette Lemons	2/27/2023
I-212	Donna Stephenson	2/27/2023
I-213	Eunhee Kim	2/27/2023
I-214	Eunhee Kim	2/27/2023
I-215	Eunhee Kim	2/27/2023
I-216	Eunhee Kim	2/27/2023
I-217	Eunhee Kim	2/27/2023
I-218	Eunhee Kim	2/27/2023
I-219	Eunhee Kim	2/27/2023
I-220	Fernando Sosa Jr.	2/27/2023
I-221	Fernando Sosa Jr.	2/27/2023
I-222	Fernando Sosa Jr.	2/27/2023

Comment Letter	Name	Date
Individuals		
I-223	Fernando Sosa Jr.	2/27/2023
I-224	Fernando Sosa Jr.	2/27/2023
I-225	Fernando Sosa Jr.	2/27/2023
I-226	Fernando Sosa Jr.	2/27/2023
I-227	Felicia Valencia	2/27/2023
I-228	Gayle DiCarlantonio	2/27/2023
I-229	Gette Kell	2/27/2023
I-230	Joseph Aklufi	2/27/2023
I-231	Joseph Aklufi	2/27/2023
I-232	Joseph Aklufi	2/27/2023
I-233	Joseph Aklufi	2/27/2023
I-234	Joseph Aklufi	2/27/2023
I-235	Joseph Aklufi	2/27/2023
I-236	Joseph Aklufi	2/27/2023
I-237	John W. Hagmann	2/27/2023
I-238	John W. Hagmann	2/27/2023
I-239	John W. Hagmann	2/27/2023
I-240	John W. Hagmann	2/27/2023
I-241	Janet Oien	2/27/2023
I-242	Janet Oien	2/27/2023
I-243	Janet Oien	2/27/2023
I-244	Janet Oien	2/27/2023
I-245	Janet Oien	2/27/2023
I-246	Janet Oien	2/27/2023
I-247	Janet Oien	2/27/2023
I-248	Josie Sosa	2/27/2023
I-249	Josie Sosa	2/27/2023
I-250	Josie Sosa	2/27/2023
I-251	Josie Sosa	2/27/2023
I-252	Josie Sosa	2/27/2023
I-253	Josie Sosa	2/27/2023
I-254	Josie Sosa	2/27/2023
I-255	Joy Weimer	2/27/2023
I-256	Joy Weimer	2/27/2023
I-257	Joy Weimer	2/27/2023
I-258	Joy Weimer	2/27/2023
I-259	Kathleen Jump	2/27/2023
I-260	Kathleen Jump	2/27/2023
I-261	Kathleen Jump	2/27/2023
I-262	Kathleen Jump	2/27/2023
I-263	Kathleen Jump	2/27/2023
I-264	Kathleen Jump	2/27/2023
I-265	Kathleen Jump	2/27/2023
I-266	Suzanee Page	2/27/2023
I-267	Suzanee Page	2/27/2023

Comment Letter	Name	Date
Individuals		
I-268	Suzanee Page	2/27/2023
I-269	Suzanee Page	2/27/2023
I-270	Suzanee Page	2/27/2023
I-271	Suzanee Page	2/27/2023
I-272	Suzanee Page	2/27/2023
I-273	Kathleen Renick	2/27/2023
I-274	Kathleen Renick	2/27/2023
I-275	Leroy Ward	2/27/2023
I-276	Michael Dearman	2/27/2023
I-277	Michael Dearman	2/27/2023
I-278	Michael Dearman	2/27/2023
I-279	Michael Dearman	2/27/2023
I-280	Michael Dearman	2/27/2023
I-281	Maria Rodriguez	2/27/2023
I-282	Maria Rodriguez	2/27/2023
I-283	Maria Rodriguez	2/27/2023
I-284	Michele Stewart	2/27/2023
I-285	Michele Stewart	2/27/2023
I-286	Nancy Gutierrez	2/27/2023
I-287	Q'Vinc Asberry	2/27/2023
I-288	Q'Vinc Asberry	2/27/2023
I-289	Q'Vinc Asberry	2/27/2023
I-290	Q'Vinc Asberry	2/27/2023
I-291	Q'Vinc Asberry	2/27/2023
I-292	Q'Vinc Asberry	2/27/2023
I-293	Q'Vinc Asberry	2/27/2023
I-294	Richard Arvizu	2/27/2023
I-295	Richard Arvizu	2/27/2023
I-296	Richard Arvizu	2/27/2023
I-297	Richard Arvizu	2/27/2023
I-298	Richard Arvizu	2/27/2023
I-299	Richard Arvizu	2/27/2023
I-300	Richard Arvizu	2/27/2023
I-301	Richard Arvizu	2/27/2023
I-302	Roger Reaney	2/27/2023
I-303	Roger Reaney	2/27/2023
I-304	Shannon Dadlez	2/27/2023
I-305	Shannon Dadlez	2/27/2023
I-306	Sean Walsh	2/27/2023
I-307	Sean Walsh	2/27/2023
I-308	Sean Walsh	2/27/2023
I-309	Tanya Ayon	2/27/2023
I-310	Tony Harkness	2/27/2023
I-311	Tony Harkness	2/27/2023
I-312	Tony Harkness	2/27/2023

Comment Letter	Name	Date
Individuals		
I-313	Tony Harkness	2/27/2023
I-314	Tony Harkness	2/27/2023
I-315	Tony Harkness	2/27/2023
I-316	Tom and Brenda Parkinson	2/27/2023
I-317	Tom and Brenda Parkinson	2/27/2023
I-318	Tom and Brenda Parkinson	2/27/2023
I-319	Tom and Brenda Parkinson	2/27/2023
I-320	Tom and Brenda Parkinson	2/27/2023
I-321	Ying Shen	2/27/2023
I-322	amaharris12@gmail.com	2/28/2023
I-323	amaharris12@gmail.com	2/28/2023
I-324	amaharris12@gmail.com	2/28/2023
I-325	amaharris12@gmail.com	2/28/2023
I-326	amaharris12@gmail.com	2/28/2023
I-327	amaharris12@gmail.com	2/28/2023
I-328	Ann and Dolores Marchand	2/28/2023
I-329	Ann and Dolores Marchand	2/28/2023
I-330	Ann and Dolores Marchand	2/28/2023
I-331	Ann and Dolores Marchand	2/28/2023
I-332	Ann and Dolores Marchand	2/28/2023
I-333	Ann and Dolores Marchand	2/28/2023
I-334	Ann and Dolores Marchand	2/28/2023
I-335	Ann and Dolores Marchand	2/28/2023
I-336	Jennifer Zamora	2/28/2023
I-337	Jennifer Zamora	2/28/2023
I-338	Jennifer Zamora	2/28/2023
I-339	Jennifer Zamora	2/28/2023
I-340	Jennifer Zamora	2/28/2023
I-341	Jennifer Zamora	2/28/2023
I-342	Jennifer Zamora	2/28/2023
I-343	Jennifer Zamora	2/28/2023
I-344	Karen Bartell	2/28/2023
I-345	Karen Bartell	2/28/2023
I-346	Karen Bartell	2/28/2023
I-347	Karen Bartell	2/28/2023
I-348	Karen Bartell	2/28/2023
I-349	Karen Bartell	2/28/2023
I-350	Karen Bartell	2/28/2023
I-351	Kevin Carney	2/28/2023
I-352	Kevin Carney	2/28/2023
I-353	K Doty	2/28/2023
I-354	Kevin Heinemann	2/28/2023
I-355	Luis Rodriguez	2/28/2023
I-356	Luis Rodriguez	2/28/2023
I-357	Luis Rodriguez	2/28/2023

Comment Letter	Name	Date
Individuals		
I-358	Luis Rodriguez	2/28/2023
I-359	Luis Rodriguez	2/28/2023
I-360	Luis Rodriguez	2/28/2023
I-361	Luis Rodriguez	2/28/2023
I-362	Melissa Zimmerman	2/28/2023
I-363	Nicole Bernas	2/28/2023
I-364	Nancy Magi	2/28/2023
I-365	Rachel Lathan	2/28/2023
I-366	Rachel Lathan	2/28/2023
I-367	Susan Fahrney	2/28/2023
I-368	Tinka Friend	2/28/2023
I-369	Tinka Friend	2/28/2023
I-370	William Schenck	2/28/2023
I-371	Berenice Dixon	2/28/2023
I-372	Berenice Dixon	2/28/2023
I-373	Berenice Dixon	2/28/2023
I-374	Berenice Dixon	2/28/2023
I-375	Tom and Brenda Parkinson	2/28/2023
I-376	Dahlia Subaran	2/28/2023
I-377	Drew Ward	2/28/2023
I-378	Drew Ward	2/28/2023
I-379	Drew Ward	2/28/2023
I-380	Drew Ward	2/28/2023
I-381	Drew Ward	2/28/2023
I-382	Drew Ward	2/28/2023
I-383	Drew Ward	2/28/2023
I-384	Drew Ward	2/28/2023
I-385	Drew Ward	2/28/2023
I-386	Francine Carbajal	2/28/2023
I-387	Francine Carbajal	2/28/2023
I-388	Francine Carbajal	2/28/2023
I-389	Francine Carbajal	2/28/2023
I-390	Gisela and Nelson Cuellar	2/28/2023
I-391	Gabriella Zlaket	2/28/2023
I-392	Gabriella Zlaket	2/28/2023
I-393	Alejandra Joseph	3/1/2023
I-394	Bobby Robinette	3/1/2023
I-395	Bobby Robinette	3/1/2023
I-396	Bobby Robinette	3/1/2023
I-397	Bobby Robinette	3/1/2023
I-398	Bobby Robinette	3/1/2023
I-399	Bobby Robinette	3/1/2023
I-400	Bobby Robinette	3/1/2023
I-401	Cynthia Spring-Pearson	3/1/2023
I-402	Cynthia Spring-Pearson	3/1/2023

Comment Letter	Name	Date
Individuals		
I-403	Cynthia Spring-Pearson	3/1/2023
I-404	Cynthia Spring-Pearson	3/1/2023
I-405	Cynthia Spring-Pearson	3/1/2023
I-406	Cynthia Spring-Pearson	3/1/2023
I-407	Cynthia Spring-Pearson	3/1/2023
I-408	Erin Swinfard	3/1/2023
I-409	Jennifer Hernandez	3/1/2023
I-410	Julie Weatherford	3/1/2023
I-411	Kristine Doty	3/1/2023
I-412	K Doty	3/1/2023
I-413	Kristy Doty	3/1/2023
I-414	K Doty	3/1/2023
I-415	Leslie Tamppari	3/1/2023
I-416	Lori Nelson	3/1/2023
I-417	Lori Nelson	3/1/2023
I-418	Maria Estabrooks	3/1/2023
I-419	Maria Estabrooks	3/1/2023
I-420	Maria Estabrooks	3/1/2023
I-421	Maria Estabrooks	3/1/2023
I-422	Maria Estabrooks	3/1/2023
I-423	Maria Estabrooks	3/1/2023
I-424	Maria Estabrooks	3/1/2023
I-425	Nancy Ward	3/1/2023
I-426	Remedios Santos	3/1/2023
I-427	Rosenberg Alfaro	3/1/2023
I-428	Senanu Spring-Pearson	3/1/2023
I-429	Senanu Spring-Pearson	3/1/2023
I-430	Senanu Spring-Pearson	3/1/2023
I-431	Senanu Spring-Pearson	3/1/2023
I-432	Senanu Spring-Pearson	3/1/2023
I-433	Senanu Spring-Pearson	3/1/2023
I-434	Senanu Spring-Pearson	3/1/2023
I-435	Carlos Lliguin	3/2/2023
I-436	Carlos Lliguin	3/2/2023
I-437	Carlos Lliguin	3/2/2023
I-438	Carlos Lliguin	3/2/2023
I-439	Carlos Lliguin	3/2/2023
I-440	Carolyn Rasmussen	3/2/2023
I-441	Chyee Wang	3/2/2023
I-442	Chyee Wang	3/2/2023
I-443	Ginette Lillibridge	3/2/2023
I-444	Ginette Lillibridge	3/2/2023
I-445	Kristin Fyfe	3/2/2023
I-446	Kristin Fyfe	3/2/2023
I-447	Kristin Fyfe	3/2/2023

Comment Letter	Name	Date
Individuals		
I-448	Kristin Fyfe	3/2/2023
I-449	Kristin Fyfe	3/2/2023
I-450	Kristin Fyfe	3/2/2023
I-451	Kristin Fyfe	3/2/2023
I-452	Peter Pettis	3/2/2023
I-453	Peter Pettis	3/2/2023
I-454	Peter Pettis	3/2/2023
I-455	Peter Pettis	3/2/2023
I-456	Peter Pettis	3/2/2023
I-457	Peter Pettis	3/2/2023
I-458	Peter Pettis	3/2/2023
I-459	Susan Nipper	3/2/2023
I-460	Aaron Bushong	3/3/2023
I-461	Aaron Bushong	3/3/2023
I-462	Aaron Bushong	3/3/2023
I-463	Aaron Bushong	3/3/2023
I-464	Aaron Bushong	3/3/2023
I-465	Aaron Bushong	3/3/2023
I-466	Aaron Bushong	3/3/2023
I-469	Annabelle Porter	3/3/2023
I-470	Annabelle Porter	3/3/2023
I-471	Annabelle Porter	3/3/2023
I-472	Annabelle Porter	3/3/2023
I-473	Annabelle Porter	3/3/2023
I-474	Annabelle Porter	3/3/2023
I-475	Annabelle Porter	3/3/2023
I-476	Ofelia Bobadilla	3/3/2023
I-467	Aaron Bushong	3/4/2023
I-468	Aaron Bushong	3/4/2023
I-477	Chris Shearer	3/4/2023
I-478	Chris Shearer	3/4/2023
I-479	Constance King	3/4/2023
I-480	Don Morris	3/4/2023
I-481	Don Morris	3/4/2023
I-482	Don Morris	3/4/2023
I-483	Don Morris	3/4/2023
I-484	Don Morris	3/4/2023
I-485	Don Morris	3/4/2023
I-486	Don Morris	3/4/2023
I-487	Don Morris	3/4/2023
I-488	Leo Bobadilla	3/4/2023
I-489	Lynn and Paul Larsen	3/4/2023
I-490	Amy Litt	3/5/2023
I-491	Amy Litt	3/5/2023
I-492	Amy Litt	3/5/2023

Comment Letter	Name	Date
Individuals		
I-493	Amy Litt	3/5/2023
I-494	Anthony Scimia Jr.	3/5/2023
I-495	Barbara Kerr	3/5/2023
I-496	Ben Murphy	3/5/2023
I-497	Christopher Gate	3/5/2023
I-498	Christopher Gate	3/5/2023
I-499	Christopher Gate	3/5/2023
I-500	Christopher Gate	3/5/2023
I-501	Christopher Gate	3/5/2023
I-502	Christine Heinemann	3/5/2023
I-503	Christine Heinemann	3/5/2023
I-504	David Divani	3/5/2023
I-505	Danela Jimenez	3/5/2023
I-506	Danela Jimenez	3/5/2023
I-507	Dr. Christian Craddock	3/5/2023
I-508	Dr. Christian Craddock	3/5/2023
I-509	Elise Estrella-Hahn	3/5/2023
I-510	Elise Estrella-Hahn	3/5/2023
I-511	Elise Estrella-Hahn	3/5/2023
I-512	Elise Estrella-Hahn	3/5/2023
I-513	Elise Estrella-Hahn	3/5/2023
I-514	Elise Estrella-Hahn	3/5/2023
I-515	Elise Estrella-Hahn	3/5/2023
I-516	Gayle DiCarlantonio	3/5/2023
I-517	George Harvilla	3/5/2023
I-518	George Harvilla	3/5/2023
I-519	George Harvilla	3/5/2023
I-520	George Harvilla	3/5/2023
I-521	George Harvilla	3/5/2023
I-522	George Harvilla	3/5/2023
I-523	Members of the League of Women Voters - SW Unit	3/5/2023
I-524	Greg Russell	3/5/2023
I-525	Greg Russell	3/5/2023
I-526	Greg Russell	3/5/2023
I-527	Georgia Renne	3/5/2023
I-528	Greg Renne	3/5/2023
I-529	John and Mary Viafora	3/5/2023
I-530	Joan Donahue	3/5/2023
I-531	Janice Oien	3/5/2023
I-532	Jean Aklufi	3/5/2023
I-533	Jean Aklufi	3/5/2023
I-534	Joe Aklufi	3/5/2023
I-535	Joe Aklufi	3/5/2023
I-536	Joe Aklufi	3/5/2023
I-537	Joe Aklufi	3/5/2023

Comment Letter	Name	Date
Individuals		
I-538	Joe Aklufi	3/5/2023
I-539	Joe Aklufi	3/5/2023
I-540	Joe Aklufi	3/5/2023
I-541	Lisa Norris	3/5/2023
I-542	Mary Harris	3/5/2023
I-543	Mary Harris	3/5/2023
I-544	Milo Rivera	3/5/2023
I-545	Melissa Walker	3/5/2023
I-546	Robert Creed	3/5/2023
I-547	Robert Creed	3/5/2023
I-548	Ryan Joseph	3/5/2023
I-549	Ryan Joseph	3/5/2023
I-550	Ryan Joseph	3/5/2023
I-551	Ryan Joseph	3/5/2023
I-552	Ryan Joseph	3/5/2023
I-553	Ryan Joseph	3/5/2023
I-554	Ryan Joseph	3/5/2023
I-555	Sara Amend	3/5/2023
I-556	Sara Amend	3/5/2023
I-557	Sara Amend	3/5/2023
I-558	Susan Nipper	3/5/2023
I-559	Shayn Sowers	3/5/2023
I-560	Tia Ballesteros	3/5/2023
I-561	Tia Ballesteros	3/5/2023
I-562	Tia Ballesteros	3/5/2023
I-563	Tia Ballesteros	3/5/2023
I-564	Tia Ballesteros	3/5/2023
I-565	Tia Ballesteros	3/5/2023
I-566	Tia Ballesteros	3/5/2023
I-567	Anthony Musumba	3/5/2023
I-568	Anthony Musumba	3/5/2023
I-569	Armendina Leyva	3/6/2023
I-570	Adolfo Saldana	3/6/2023
I-571	Beverly Arias	3/6/2023
I-572	Beverly Arias	3/6/2023
I-573	Beverly Arias	3/6/2023
I-574	Beverly Arias	3/6/2023
I-575	Beverly Arias	3/6/2023
I-576	Brady Goodson	3/6/2023
I-577	Brady Goodson	3/6/2023
I-578	Christine Martin	3/6/2023
I-579	Christine Martin	3/6/2023
I-580	Felix and Felicia Valencia	3/6/2023
I-581	Felix and Felicia Valencia	3/6/2023
I-582	Felix and Felicia Valencia	3/6/2023

Comment Letter	Name	Date
Individuals		
I-583	Felix and Felicia Valencia	3/6/2023
I-584	Felix and Felicia Valencia	3/6/2023
I-585	Felix and Felicia Valencia	3/6/2023
I-586	Felix and Felicia Valencia	3/6/2023
I-587	Jason Gonsman	3/6/2023
I-588	Jason Gonsman	3/6/2023
I-589	Jason Gonsman	3/6/2023
I-590	Ken Renne	3/6/2023
I-591	Leo Bobadilla	3/6/2023
I-592	Larry lest	3/6/2023
I-593	Lenora Mitchell	3/6/2023
I-594	Linda Tingley	3/6/2023
I-595	Milo Rivera	3/6/2023
I-596	Maria Rodriguez	3/6/2023
I-597	Maria Rodriguez	3/6/2023
I-598	Maria Rodriguez	3/6/2023
I-599	Maria Rodriguez	3/6/2023
I-600	Tim Martin	3/6/2023
I-601	Tim Martin	3/6/2023
I-602	Christine Martin	3/7/2023
I-603	Gayle DiCarlantonio	3/7/2023
I-604	Jeremy Goldman	3/7/2023
I-605	Jenna Pontious	3/7/2023
I-606	Jenna Pontious	3/7/2023
I-607	Jenna Pontious	3/7/2023
I-608	Linda Tingley	3/7/2023
I-609	Mark and Jennifer Sullivan	3/7/2023
I-610	Mark and Jennifer Sullivan	3/7/2023
I-611	Mark and Jennifer Sullivan	3/7/2023
I-612	Mark and Jennifer Sullivan	3/7/2023
I-613	Mark and Jennifer Sullivan	3/7/2023
I-614	Mark and Jennifer Sullivan	3/7/2023
I-615	Mark and Jennifer Sullivan	3/7/2023
I-616	Mark and Jennifer Sullivan	3/7/2023
I-617	Mark and Jennifer Sullivan	3/7/2023
I-618	Mark and Jennifer Sullivan	3/7/2023
I-619	Mark and Jennifer Sullivan	3/7/2023
I-620	Michele Muehls	3/7/2023
I-621	Michele Muehls	3/7/2023
I-622	Michele Muehls	3/7/2023
I-623	Michele Muehls	3/7/2023
I-624	Michele Muehls	3/7/2023
I-625	Michele Muehls	3/7/2023
I-626	Milo Rivera	3/7/2023
I-627	Milo Rivera	3/7/2023

Comment Letter	Name	Date
Individuals		
I-628	Michelle Singleton	3/7/2023
I-629	Michelle Singleton	3/7/2023
I-630	Michelle Singleton	3/7/2023
I-631	Michelle Singleton	3/7/2023
I-632	Michelle Singleton	3/7/2023
I-633	Michelle Singleton	3/7/2023
I-634	Michelle Singleton	3/7/2023
I-635	Michael Wilson	3/7/2023
I-636	Rod Deluhery	3/7/2023
I-637	Rosario Garcia	3/7/2023
I-638	Rosario Garcia	3/7/2023
I-639	Rosario Garcia	3/7/2023
I-640	Rosario Garcia	3/7/2023
I-641	Rosario Garcia	3/7/2023
I-642	Rosario Garcia	3/7/2023
I-643	Richard Stalder	3/7/2023
I-644	Stephanie Jimenez	3/7/2023
I-645	Stephanie Jimenez	3/7/2023
I-646	Stephanie Jimenez	3/7/2023
I-647	Stephanie Jimenez	3/7/2023
I-648	Stephanie Jimenez	3/7/2023
I-649	Stephanie Jimenez	3/7/2023
I-650	Stephanie Jimenez	3/7/2023
I-651	Tim Martin	3/7/2023
I-652	Tom Parkinson	3/7/2023
I-653	Aaron Bushong	3/8/2023
I-654	Avery Cintura	3/8/2023
I-655	Christine Martin	3/8/2023
I-656	Christine Martin	3/8/2023
I-657	Greg Garnier	3/8/2023
I-658	John Lyell	3/8/2023
I-659	John Lyell	3/8/2023
I-660	John Lyell	3/8/2023
I-661	Kristy Doty	3/8/2023
I-662	Kristy Doty	3/8/2023
I-663	Kristy Doty	3/8/2023
I-664	Kristy Doty	3/8/2023
I-665	Kristy Doty	3/8/2023
I-666	Kristy Doty	3/8/2023
I-667	Lisa Everson	3/8/2023
I-668	Lenora Mitchell	3/8/2023
I-669	Linda Tingly	3/8/2023
I-670	Linda Tingly	3/8/2023
I-671	Linda Tingly	3/8/2023
I-672	Linlin Zhao	3/8/2023

Comment Letter	Name	Date
Individuals		
I-673	Melody Clark	3/8/2023
I-674	Milo Rivera	3/8/2023
I-675	Steve Huddleston	3/8/2023
I-676	Shaan Saigol	3/8/2023
I-677	Sarah Williams	3/8/2023
I-678	Tim Martin	3/8/2023
I-679	Tim Martin	3/8/2023
I-680	Victoria Belova	3/8/2023
I-681	Yueqiu Zhou	3/8/2023
I-682	Ann and Dolores Marchand	3/9/2023
I-683	Anza Akram	3/9/2023
I-684	Anza Akram	3/9/2023
I-685	Abigail Banning	3/9/2023
I-686	Abigail Banning	3/9/2023
I-687	Abigail Banning	3/9/2023
I-688	Abigail Banning	3/9/2023
I-689	Abigail Banning	3/9/2023
I-690	Abigail Banning	3/9/2023
I-691	Abigail Banning	3/9/2023
I-692	Abigail Banning	3/9/2023
I-693	Aldofo Jimenez	3/9/2023
I-694	Amber Peaslee	3/9/2023
I-695	Amber Peaslee	3/9/2023
I-696	Amber Peaslee	3/9/2023
I-697	Amber Peaslee	3/9/2023
I-698	Amber Peaslee	3/9/2023
I-699	Amber Peaslee	3/9/2023
I-700	Amber Peaslee	3/9/2023
I-701	Amber Peaslee	3/9/2023
I-702	Ana Ramirez	3/9/2023
I-703	Anthony Scimia Jr.	3/9/2023
I-704	Ajay Shah	3/9/2023
I-705	Andrea Wood	3/9/2023
I-706	Aaron Bushong	3/9/2023
I-707	Aaron Bushong	3/9/2023
I-708	Allison Bushong	3/9/2023
I-709	Allison Bushong	3/9/2023
I-710	Allison Bushong	3/9/2023
I-711	Allison Bushong	3/9/2023
I-712	Allison Bushong	3/9/2023
I-713	Allison Bushong	3/9/2023
I-714	Allison Bushong	3/9/2023
I-715	Allison Bushong	3/9/2023
I-716	Allison Bushong	3/9/2023
I-717	Allison Bushong	3/9/2023

Comment Letter	Name	Date
Individuals		
I-718	Allison Bushong	3/9/2023
I-719	Allison Bushong	3/9/2023
I-720	Amisha Shah	3/9/2023
I-721	Bobby Robinette	3/9/2023
I-722	Brian Wardle	3/9/2023
I-723	Candy Blokland	3/9/2023
I-724	Chris Hannon	3/9/2023
I-725	Cynthia Jessen	3/9/2023
I-726	Cynthia Jessen	3/9/2023
I-727	Cynthia Jessen	3/9/2023
I-728	Cynthia Jessen	3/9/2023
I-729	Cynthia Jessen	3/9/2023
I-730	Cynthia Jessen	3/9/2023
I-731	Cynthia Jessen	3/9/2023
I-732	Cynthia Jessen	3/9/2023
I-733	Christine Martin	3/9/2023
I-734	Christine Martin	3/9/2023
I-735	Christine Martin	3/9/2023
I-736	Christine Martin	3/9/2023
I-737	Clay Muehls	3/9/2023
I-738	Clay Muehls	3/9/2023
I-739	Clay Muehls	3/9/2023
I-740	Clay Muehls	3/9/2023
I-741	Clay Muehls	3/9/2023
I-742	Clay Muehls	3/9/2023
I-743	Clay Muehls	3/9/2023
I-744	Corinne Perez	3/9/2023
I-745	Corinne Perez	3/9/2023
I-746	Chad Smith	3/9/2023
I-747	Duffy Atkinson	3/9/2023
I-748	David Doty	3/9/2023
I-749	David Doty	3/9/2023
I-750	David Doty	3/9/2023
I-751	David Doty	3/9/2023
I-752	David Doty	3/9/2023
I-753	David Doty	3/9/2023
I-754	David Doty	3/9/2023
I-755	Denette Lemons	3/9/2023
I-756	Dolores Reyna	3/9/2023
I-757	David Reznick, Ph.D.	3/9/2023
I-758	Eileen Bloom	3/9/2023
I-759	Elisa Estrella-Hahn	3/9/2023
I-760	Esmeralda Montes	3/9/2023
I-761	Esmeralda Montes	3/9/2023
I-762	Esmeralda Montes	3/9/2023

Comment Letter	Name	Date
Individuals		
I-763	Felix and Felicia Valencia	3/9/2023
I-764	Fera Momtaz	3/9/2023
I-765	Freddie Quintana	3/9/2023
I-766	Freddie Quintana	3/9/2023
I-767	Freddie Quintana	3/9/2023
I-768	Freddie Quintana	3/9/2023
I-769	Freddie Quintana	3/9/2023
I-770	Freddie Quintana	3/9/2023
I-771	Freddie Quintana	3/9/2023
I-772	Freddie Quintana	3/9/2023
I-773	Fernando Sosa Jr.	3/9/2023
I-774	Gayle DiCarlantonio	3/9/2023
I-775	Honey Bernas	3/9/2023
I-776	Ira and Rajean Long	3/9/2023
I-777	John and Mary Viafora	3/9/2023
I-778	Jean Aklufi	3/9/2023
I-779	Justin Dillon	3/9/2023
I-780	Juan Garcia	3/9/2023
I-781	Jason Gonsman	3/9/2023
I-782	Justin Grigg	3/9/2023
I-783	John W. Hagmann	3/9/2023
I-784	Janice Oien	3/9/2023
I-785	Kevin Shearer	3/9/2023
I-786	Brenda Shearer	3/9/2023
I-787	Christopher Shearer	3/9/2023
I-788	Jerry Shearer	3/9/2023
I-789	Jen Larratt-Smith	3/9/2023
I-790	Jen Larratt-Smith	3/9/2023
I-791	Josie Sosa	3/9/2023
I-792	Joseph Aklufi	3/9/2023
I-793	Karen Baker	3/9/2023
I-794	Kaelan Barrios	3/9/2023
I-795	Kevin Carney	3/9/2023
I-796	Kristine Doty	3/9/2023
I-797	Kyle Warsinski	3/9/2023
I-798	Kyle Warsinski	3/9/2023
I-799	Leslie Bushong	3/9/2023
I-800	Leslie Bushong	3/9/2023
I-801	Leslie Bushong	3/9/2023
I-802	Leslie Bushong	3/9/2023
I-803	Leslie Bushong	3/9/2023
I-804	Leslie Bushong	3/9/2023
I-805	Leslie Bushong	3/9/2023
I-806	Leslie Bushong	3/9/2023
I-807	Leslie Bushong	3/9/2023

Comment Letter	Name	Date
Individuals		
I-808	Leslie Bushong	3/9/2023
I-809	Leslie Bushong	3/9/2023
I-810	Leslie Bushong	3/9/2023
I-811	Linda TinglyRivera	3/9/2023
I-812	Linda TinglyRivera	3/9/2023
I-813	Linda TinglyRivera	3/9/2023
I-814	Linda TinglyRivera	3/9/2023
I-815	Linda TinglyRivera	3/9/2023
I-816	Linda TinglyRivera	3/9/2023
I-817	Lin Zhao	3/9/2023
I-818	Mary Harris	3/9/2023
I-819	Mark Jessen	3/9/2023
I-820	Mark Jessen	3/9/2023
I-821	Mark Jessen	3/9/2023
I-822	Mark Jessen	3/9/2023
I-823	Mark Jessen	3/9/2023
I-824	Mark Jessen	3/9/2023
I-825	Mark Jessen	3/9/2023
I-826	Mark Jessen	3/9/2023
I-827	Michael McCarthy	3/9/2023
I-828	Michael McCarthy	3/9/2023
I-829	Michael McCarthy	3/9/2023
I-830	Michael McCarthy	3/9/2023
I-831	Michael McCarthy	3/9/2023
I-832	Michael McCarthy	3/9/2023
I-833	Michael McCarthy	3/9/2023
I-834	Michael McCarthy	3/9/2023
I-835	Michael McCarthy	3/9/2023
I-836	Michael McCarthy	3/9/2023
I-837	Michele Muehls	3/9/2023
I-838	Milo Rivera	3/9/2023
I-839	Milo Rivera	3/9/2023
I-840	Milo Rivera	3/9/2023
I-841	Matt Silveous	3/9/2023
I-842	Michelle Singleton	3/9/2023
I-843	Melissa Suarez	3/9/2023
I-844	Mary Viafora	3/9/2023
I-845	Nicole Bernas	3/9/2023
I-846	Nicolette Rohr	3/9/2023
I-847	Pete Pettis	3/9/2023
I-848	Rick Lloyd	3/9/2023
I-849	Raquel Ortiz	3/9/2023
I-850	Ronald Peters	3/9/2023
I-851	Ronald Peters	3/9/2023
I-852	Ronald Peters	3/9/2023

Comment Letter	Name	Date
Individuals		
I-853	Ronald Peters	3/9/2023
I-854	Ronald Peters	3/9/2023
I-855	Ronald Peters	3/9/2023
I-856	Ronald Peters	3/9/2023
I-857	Rita Schneider	3/9/2023
I-858	Rita Schneider	3/9/2023
I-859	Rita Schneider	3/9/2023
I-860	Sara Amend	3/9/2023
I-861	Susana Balmer	3/9/2023
I-862	Ken and Susan Nipper	3/9/2023
I-863	Suzanne Page	3/9/2023
I-864	Sally Quintana	3/9/2023
I-865	Sally Quintana	3/9/2023
I-866	Sally Quintana	3/9/2023
I-867	Sally Quintana	3/9/2023
I-868	Sally Quintana	3/9/2023
I-869	Sally Quintana	3/9/2023
I-870	Sally Quintana	3/9/2023
I-871	Sally Quintana	3/9/2023
I-872	Tia Ballestros	3/9/2023
I-873	Tim Martin	3/9/2023
I-874	Tim Martin	3/9/2023
I-875	Tim Martin	3/9/2023
I-876	Tom Schneider	3/9/2023
I-877	Veronica Juarez	3/9/2023
I-878	Yolanda Elias	3/9/2023
I-879	Abdallah Karim	3/10/2023
I-880	Abdallah Karim	3/10/2023
I-881	Abdallah Karim	3/10/2023
I-882	Abdallah Karim	3/10/2023
I-883	Abdallah Karim	3/10/2023
I-884	Abdallah Karim	3/10/2023
I-885	Abdallah Karim	3/10/2023
I-886	Abdallah Karim	3/10/2023
I-887	Abdallah Karim	3/10/2023
I-888	Abdallah Karim	3/10/2023
I-889	Abdallah Karim	3/10/2023
I-890	Andrew Larratt-Smith	3/10/2023
I-891	Andy Melendrez	3/10/2023
I-892	Alice Musumba	3/10/2023
I-893	Andrew Silva	3/10/2023
I-894	Andrew Silva	3/10/2023
I-895	Andrew Silva	3/10/2023
I-896	Andrew Silva	3/10/2023
I-897	Andrew Silva	3/10/2023

Comment Letter	Name	Date
Individuals		
I-898	Andrew Silva	3/10/2023
I-899	Andrew Silva	3/10/2023
I-900	Andrew Silva	3/10/2023
I-901	Betty A. Anderson	3/10/2023
I-902	Brian Wardle	3/10/2023
I-903	Brian Wardle	3/10/2023
I-904	Cindy Chiek	3/10/2023
I-905	Cindy Chiek	3/10/2023
I-906	Cindy Chiek	3/10/2023
I-907	Cindy Chiek	3/10/2023
I-908	Cindy Chiek	3/10/2023
I-909	Collete Lee	3/10/2023
I-910	Carlos Lliguin	3/10/2023
I-911	Christopher Nielsen	3/10/2023
I-912	Christopher Nielsen	3/10/2023
I-913	Christopher Nielsen	3/10/2023
I-914	Clarissa Rodriguez	3/10/2023
I-915	Carolina R	3/10/2023
I-916	David A. Rose III	3/10/2023
I-917	David A. Rose III	3/10/2023
I-918	Debbie Walsh	3/10/2023
I-919	Eunhee Kim	3/10/2023
I-920	Gayle DiCarlantonio	3/10/2023
I-921	Greg Renne	3/10/2023
I-922	Honey Bernas	3/10/2023
I-923	Kyle Warsinski	3/10/2023
I-924	Lewis Allen	3/10/2023
I-925	Lisa Everson	3/10/2023
I-926	M. Clark	3/10/2023
I-927	Mason Deluhery	3/10/2023
I-928	Magie Lacambra	3/10/2023
I-929	Magie Lacambra	3/10/2023
I-930	—	3/10/2023
I-931	Nicole Bernas	3/10/2023
I-932	Nicole Bernas	3/10/2023
I-933	Nicole Bernas	3/10/2023
I-934	Nicole Bernas	3/10/2023
I-935	Nicole Bernas	3/10/2023
I-936	Owen Turner	3/10/2023
I-937	Pete Elliot	3/10/2023
I-938	Pete Elliot	3/10/2023
I-939	Pete Elliot	3/10/2023
I-940	Pete Elliot	3/10/2023
I-941	Pete Elliot	3/10/2023
I-942	Pete Elliot	3/10/2023

Comment Letter	Name	Date
Individuals		
I-943	Pete Elliot	3/10/2023
I-944	Pete Elliot	3/10/2023
I-945	Patricia Reynolds	3/10/2023
I-946	Rattana Chiek	3/10/2023
I-947	Rattana Chiek	3/10/2023
I-948	Rattana Chiek	3/10/2023
I-949	Rosamonde Cook, Ph.D.	3/10/2023
I-950	Rosamonde Cook, Ph.D.	3/10/2023
I-951	Rosamonde Cook, Ph.D.	3/10/2023
I-952	Rosamonde Cook, Ph.D.	3/10/2023
I-953	Rosamonde Cook, Ph.D.	3/10/2023
I-954	Rosie Russell	3/10/2023
I-955	Robert Walker	3/10/2023
I-956	Steve Huddleston	3/10/2023
I-957	Shann Saigol	3/10/2023
I-958	Tuesday Morgan	3/10/2023
I-959	Veronica Juarez	3/10/2023
I-960	Veronica Juarez	3/10/2023
I-961	Veronica Juarez	3/10/2023
I-962	Veronica Juarez	3/10/2023
I-963	Veronica Juarez	3/10/2023
I-964	Veronica Juarez	3/10/2023
I-965	Veronica Juarez	3/10/2023
I-966	Yvonne Turner	3/10/2023

From: Mary Ann Ruiz <ruizmaryann@gmail.com>
Sent: Monday, January 9, 2023 7:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau DEIR

Mr. Fairbanks -

The West Campus Upper Plateau DEIR was released this evening, and the March JPA is holding a public comment meeting on Weds. 1/11 at 6:30 pm.

Would you please confirm that public comments made at the 1/11 public meeting , whether in person, via zoom, or in writing, will be included in and responded to in the FEIR? Please also include all those giving public comment in any future notices of meetings or notices availability of documents related to this DEIR,

I-1.1

Thank you.

--
Mary Ann Ruiz

Letter I-1

Mary Ann Ruiz
January 9, 2023

I-1.1 This comment requests confirmation that all public comments made at the public meeting for the Project held on January 11, 2023, will be responded to in the Final EIR. The comment also requests that all commenters be given notice of future public meetings or availability of documents associated with the Draft EIR. All comments made at the public meeting held on January 11, 2023 are included and responded to in the Public Meeting Responses to Comments subsection within this volume of the Final EIR. Members of the public who have requested to be added to the distribution list for the Project will receive a notice for all public matters associated with the Project. This comment does not include any specific issues or concerns regarding the environmental analysis in the Draft EIR; as such, no further response is provided.

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From: Jen L <jlarrattsmith@gmail.com>
Sent: Tuesday, January 10, 2023 10:17 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau Draft EIR comment

Dear Mr. Fairbanks,

Thank you for alerting me to the release of the Draft EIR. I will be following up with the community, and I will likely be submitting multiple comments, but here is my first one.

I want to submit to the public record our online petition: www.change.org/no-more-warehouses

I submitted this petition, which is just shy of 2,800 names this morning, back in May to the Commission. Riverside Neighbors Opposing Warehouses (R-NOW) has been diligently engaging in public processes, attending developer meetings, speaking at Commission meetings, and using whatever mechanisms we have to alert the March JPA to our opposition to industrial development on the West Campus Upper Plateau for the past 10 months. I-2.1

I am disappointed that none of your alternate plans consider land use other than industrial development. There is no consideration of an office park with high-tech jobs (as you originally planned for the area in your Draft General Plan 2010), nor do you consider solar panels as some community members have suggested multiple times in public comments. Our suggestions and concerns have been repeatedly ignored. The only thing for which our community can unanimously agree is that we do not want industrial warehouses, let alone an industrial warehouse complex, built on that land. Your alternate plans do not consider our feedback. I-2.2

You are a public agency charged with repurposing taxpayer land. You have a responsibility to meaningfully engage the public. You cannot announce to someone that you will set fire to their house and then claim to have meaningfully engaged them because you gave them a public forum to make their pleas before you burned it down. We want you to actually respond to the public's concerns, not merely hold meetings where we can express them. I-2.3

Please do better.

Thank you.

Sincerely,

Jen Larratt-Smith
Riverside Neighbors Opposing Warehouses (R-NOW)

Letter I-2

Jen Larratt Smith
January 10, 2023

I-2.1 This comment includes a link to a petition to March JPA opposing the Project. No specific comments or questions on the environmental analysis in the Draft EIR are included in this comment; as such, no further response is provided.

I-2.2 This comment states that the Draft EIR does not consider non-industrial alternatives, such as office park uses or solar panels. The commenter requests that additional alternatives be considered. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated. Further, the draft specific plan allows numerous non-industrial uses within the Business Park and Mixed-Use districts, including financial institutions, government offices, medical clinics, business and professional offices, regional and corporate offices, and research and development. In fact, many of these uses, including government offices, medical clinics and research and development are also allowed uses within the Industrial district. Regarding solar, due to the Project site's proximity to March ARB/IPA, solar photovoltaic systems require approval by the Riverside County Airport Land Use Commission and March ARB to ensure such systems do not interfere with airport operations. Rooftop solar for the Project was assumed and included within the analysis and evaluation throughout the Draft EIR. MM-AES-3 requires the submittal of a glint and glare study to the Riverside ALUC and March ARB for review and approval. Revised MM-GHG-1 requires the Project to generate 100% of the buildings' power requirements, or the maximum permitted by the Riverside ALUC.

I-2.3 This comment is conclusory in nature and does not raise any specific issues or concerns regarding the environmental analysis in the Draft EIR; as such, no further response is provided.

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From: Jen L <jlarrattsmith@gmail.com>
Sent: Tuesday, January 10, 2023 3:07 PM
To: Dan Fairbanks
Subject: Re: West Campus Upper Plateau Draft EIR comment

Thank you, Mr. Fairbanks. I will work on getting you the names and comments for the petition and should be able to get that to you later this week. I-3.1

Jen

On Tuesday, January 10, 2023, Dan Fairbanks <fairbanks@marchjpa.com> wrote:

> Jen,
>
> I have the petition from May, but I wasn't able to pull up any updated info from the link you provided. It was easy to sign the petition on line, but I didn't see how I could download the whole petition. Feel free to call me at 951 656-7000 or provide directions on how to pull up the most recent version of the petition.
>
> Your comments below are comments on the draft EIR and will be treated as such.

Dan Fairbanks

Planning Director

March Joint Powers Authority

14205 Meridian Parkway, #140

Riverside, CA 92518

Phone: (951) 656-7000

Fax: (951) 653-5558

Email: fairbanks@marchjpa.com

From: Jen L <jlarrattsmith@gmail.com>
Sent: Tuesday, January 10, 2023 10:17 AM
To: Dan Fairbanks <fairbanks@marchjpa.com>
Subject: West Campus Upper Plateau Draft EIR comment

Dear Mr. Fairbanks,

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Please do better.

Thank you.

Sincerely,

Jen Larratt-Smith

Riverside Neighbors Opposing Warehouses (R-NOW)

Letter I-3

Jen Larratt Smith
January 10, 2023

I-3.1 This comment states that names and comments associated with the petition referenced in Comment I-2.1 will be submitted at a later date. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. This comment does not include any specific issues or concerns regarding the environmental analysis in the Draft EIR; as such, no such, no further response is provided.

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From: Jen L <jlarrattsmith@gmail.com>
Sent: Tuesday, January 10, 2023 11:10 PM
To: Dan Fairbanks
Subject: Re: West Campus Upper Plateau Draft EIR comment
Attachments: change.org petition comments.pdf; change.org petition signatures.pdf

Hi Dan,

Here are the petition signatures and the comments from our change.org petition. Let me know if you need anything else to access them. I-4.1

Thanks!

Jen

On Tue, Jan 10, 2023 at 2:57 PM Dan Fairbanks <fairbanks@marchjpa.com> wrote:

> Jen,
>
> I have the petition from May, but I wasn't able to pull up any updated info from the link you provided. It was easy to sign the petition on line, but I didn't see how I could download the whole petition. Feel free to call me at 951 656-7000 or provide directions on how to pull up the most recent version of the petition.
>
> Your comments below are comments on the draft EIR and will be treated as such.

Dan Fairbanks

Planning Director

March Joint Powers Authority

14205 Meridian Parkway, #140

Riverside, CA 92518

Phone: (951) 656-7000

Fax: (951) 653-5558

Email: fairbanks@marchjpa.com

From: Jen L <jlarrattsmith@gmail.com>
Sent: Tuesday, January 10, 2023 10:17 AM
To: Dan Fairbanks <fairbanks@marchjpa.com>
Subject: West Campus Upper Plateau Draft EIR comment

Dear Mr. Fairbanks,

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Please do better.

Thank you.

Sincerely,

Jen Larratt-Smith

Riverside Neighbors Opposing Warehouses (R-NOW)

Name	City	State	Postal Code	Country	Commented Date	Comment
Lenora Mitchell	Riverside	CA	91766	US	3/31/2022	"Riverside or Warehouse-side : where do you want to live?"
Violet Rugh	Pomona		91766	US	4/1/2022	"We need open land."
kevin castellanos	College Park	MD	20740	US	4/1/2022	"More parks, orange groves, and housing. No more warehouses, mundane jobs or cheap labor!!!"
Esther Cervantes	Riverside	CA	92507	US	4/2/2022	"We do no need more warehouse near our homes."
Cheryl Voss	Riverside	CA	92506	US	4/2/2022	"Our streets and highways are already neglected and traffic is horrid. As residents, the last things we need or want are more pot holes caused by trucks and an infrastructure that can't support the increased traffic."
Jiovanni Hernandez	Mead valley	CA	90220	US	4/2/2022	"Stop building so many warehouses."
Karissa Hammar	Riverside	CA	92501	US	4/2/2022	"There are already too many warehouses in our area. I enjoy looking at and walking in and around the areas of nature. They improve my quality of life."
MARisol Lomeli	Woodland Hills	CA	91367	US	4/2/2022	"I love sycamore"
Cindi Robertson	Lake Forest	CA	92630	US	4/2/2022	"Riverside has enough warehouses and not enough nature areas. This is not needed and only wanted for financial greed."
Kelly Wrightstone	Riverside	CA	92508	US	4/2/2022	"No more warehouses!"
Jennifer Stoever	Riverside	CA	92508	US	4/2/2022	"We need wilderness areas to walk and bike!!"
Elizabeth Young	Riverside	CA	92508	US	4/2/2022	"We have more than enough warehouses! We need open spaces for families to enjoy recreation. Bike paths, walking, fishing, etc. Orange County has some beautiful open spaces for families amid their concrete so we can too!!!"
Priscilla Adair	Riverside	CA	92508	US	4/2/2022	"I live in this neighborhood, and the big trucks coming through for the warehouses are destroying our streets"
charissa adams	riverside	CA	92504	US	4/2/2022	"The area doesn’t need more semi truck traffic and smog. Don’t decimate the land our wildlife has left"
Rose Daniels	Temecula	CA	92591	US	4/2/2022	"I work in Riverside. More warehouses will"

Tracie Rodrigues	Riverside	CA	92507	US	4/3/2022	"There are no places to walk or play anymore"
sherry miller	Riverside	CA	92508	US	4/3/2022	"I live here and I don't want to live in an industrial zone"
tina ely	Corona	CA	92882	US	4/3/2022	"Stop building industrial buildings a majority of them sit empty for years build more walking areas for hiking and for biking. How about a big park for our kids to play i was in AZ and there Parks are beautiful for kids."
Noelle Chamberlain	Riverside	CA	92501	US	4/3/2022	"We need some natural, open space in this city preserved before it’s all gone!"
Claudia Cervantes	Riverside	CA	92506	US	4/4/2022	"Our children need the nature, why take that away from them?"
Dianna Hentzschel	Perris	CA	92571	US	4/5/2022	"We have enough warehouses and traffic in this area. We need to keep some recreational area of active and healthy."
Sherry Marshall	Riverside	CA	92653	US	4/5/2022	"My father was an avid mountain biker and enjoyed this place so much. He spent that last moments of his life on these trails. He built a community of friends and spent time with them on this trail, enjoying the city he lived in, the wildlife out on these trails. You can see the warehouses encroaching on this are and it would be terrible to loose these recreational areas and all the amazing wildlife that live and thrive in this natural area. You would displace an ever decreasing amount of area that is home to this wild life. Some amazing huge birds that nest in the trees out here. Please keep it wild and open."

Sherry Marshall	Riverside	CA	92653	US	4/5/2022	"There are so few places for people to go and just enjoy time away from city life without packing up and going away. This area also gets the community out there moving and meeting others in their community. Please don't take this area for warehouses. The wildlife that this u developed area houses is amazing and so beautiful. You would be displacing so many. What a shame losing this trail would be. Please share on your FB pages and social media accounts."
Rafael Jimenez	Riverside	CA	92508	US	4/5/2022	"I'm signing because my neighborhood is going to be directly affected by these warehouses. If built as planned, these mega-warehouses will be surrounded by homes on three sides, including mine. This undeveloped area is the only buffer left between our neighborhoods and the hundreds of warehouses going up by the 215 Freeway, south of the 60 Freeway interchange."
eric Walker	riverside	CA	92508	US	4/6/2022	"Enough is enough. We need wilderness to thrive not useless buildings serving people who live in areas without warehouses and a Better Quailty of life! We want and deserve better."
dawn villavicencio	Riverside	CA	92508	US	4/7/2022	"I want to keep the peace and quiet that we all currently enjoy, keep the wildlife and serenity that nature provides"
ang mum	Riverside	CA	92508	US	4/7/2022	"No more warehouses"
Kristy Bauer	Riverside	CA	92508	US	4/7/2022	"This lot is directly behind my backyard"
Helena Craig	Riverside	CA	92587	US	4/7/2022	"We do not need anymore warehouses or wildlife being destroyed!"
Maria Garde				US	4/7/2022	"That open space is lovely right behind the church and a testament to God's serenity. We don't need more traffic, pollution, etc."
Amanda Gomez	Riverside	CA	92508	US	4/7/2022	"No more trucks up Van Buren."

Gabriela Mendez	Riverside	CA	92503	US	4/8/2022	"I would like to preserve this green space and warehousing should not be placed next to sensitive receptors!"
Gina Binhimaid	Pompom121@live.com	CA	92508	US	4/8/2022	"Too much traffic and pollution already!!"
Michael Kaudze	Riverside	CA	92505	US	4/8/2022	"We don't need the warehouses. Keep the land green."
Terry Smith	Los Angeles	CA	90026	US	4/8/2022	"Our land needs our protection. There’s enough traffic and whearhouses. Keep them out of our neighborhoods!"
Victoria Bavier				US	4/8/2022	"My family uses these trails every single day either to walk our dogs, run, bike, or hike. It would be a shame to lose this beautiful preserve!"
Marc Feldstein	Riverside	CA	60030	US	4/9/2022	"We live kiddie-korner to the barton/alessandro distribution center.1. Barton goes only 2 blocks north and south of alessandro. There is no room for this development.2. This puts a significant burden on public safety where the police department is lacking 20 officers and the fire department would need to engage in multiple change of quarters once the site is complete.3. The area has significant, severe vehicle accidents and this will only make that worse.4. A common concern on highways and local streets is semi trucks and this doubles or triples the semis in the area."
Mark Lien	Riverside	CA	92508	US	4/10/2022	"I do not want warehouses by the old March ammunition storage area."
Doug Bailey	Riverside	CA	92503	US	4/14/2022	"No more warehouses, no more traffic, no more people"

Gary Williams	Riverside	CA	92508	US	4/16/2022	"I have lived in this area for 16 years, and I frequent this area on my bike several times per week. As warehousing proliferates in this area, and more open space gets built on, the disappearing habitat for wildlife is creating a litany of impacts for those threatened species, and for local residents and pet owners as well. These are open spaces that will disappear forever."
Aaron Rolens	Riverside	CA	92508	US	4/19/2022	"The warehouse development around here is ridiculous."
Sandi Cabrera	Riverside	CA	92508	US	4/20/2022	"Pollution, traffic, displacement of precious wildlife(hawks, eagles, coyotes and protected species KRats. Too close to schools, churches and parks- (diesel fumes.) Ruining our community and decreasing property values."
Jill McCormick	Riverside	CA	92505	US	4/20/2022	"I'm glad to see a petition about this as it's been a concern of mine and the negative impact on surrounding neighborhoods as well as the wildlife. It might be super helpful to others if a clear map or full description of the boundaries was included with the petition pages."
Sara Sara A Martinez	Riverside	CA	92508	US	4/23/2022	"I oppose the building of more warehouses as it will have a negative impact on wildlife and cause more pollution."
Stacey Guzman	Lake Elsinore	CA	92530	US	4/25/2022	"My daughter is on the mountain bike team at Woodcrest Christian and the team practices twice a week. It’s so Nice to see young kids out around nature."
selena wilson	Riverside	CA	92503	US	4/27/2022	"No more warehouse! Enough already. NO!!!!"
Sara Lopez	Riverside	CA	92506	US	4/28/2022	"i want to keep riverside green"
Alma Brigandi	Corona	CA	92880	US	4/28/2022	"To much traffic"
Ashley Trumbull	Riverside	CA	92503	US	4/28/2022	"This is our home we need a nice area not to be run down."

Kevin Conklin	Riverside		92504	US	4/28/2022	"I don't want gross air and noise pollution in their back yards. In a canyon where all the noise will be amplified and carry well past the homes on the edge. Enough of Fontana is already here."
Corinne Perez	Riverside	CA	92508	US	4/30/2022	"The City, Joint Powers and Developers can say or work for the outcome they want. How can an environmental study be completed when the warehouses and traffic of 3500 jobs are not here yet? There are plenty of empty warehouses. Think about that, City Counsel espoused at a meeting last year that we should be grateful this will bring 3500 jobs to the area. Presently, there are plenty of jobs that employers can't fill. This means 3500 cars and trucks in our neighborhood all competing for access to and on 215 or Van Buren. Out neighborhood is locked in and does not have enough emergency egress/ingress. Once it is allowed, we won't know the damage to the local population until well after this project is complete, people and property has been damaged, making it too late. They should review environmental studies of Los Angeles neighborhoods that have truck freight traffic. There is plenty of vacant desert land, move out."
Connie Austin	Perris	CA	92570	US	4/30/2022	"I like rural"
Eunice Ramirez	Perris	CA	92570	US	4/30/2022	"Ton many warehouses that are polluting the air."
Toni Sandell	Riverside	CA	92503	US	5/1/2022	"The VOTERS in this area are being ignored by our politicians who are bowing to big money."

Peggy Matthews	Riverside	CA	92507	US	5/2/2022	"This is ridiculous!!! Isn't there enough warehouses in Riverside area already? Or in the I. E. area period? STOP THE HOUSING AND COMMERCIAL BUILDING ALREADY! You are taking homes from what little of wild life we have left in Riverside. It's bad already that the wild life is having to come deeper into city limits looking for food or a place to make a home. It won't be much longer before our coyote's, road runners, snakes, bob cats, etc end up on the endangered species list because they are being kicked out of their natural habitats and being forced to go deeper into the city, which then puts them at more risk of being killed. It's sad to look around here and see all the unnecessary buildings that once were beautiful wild life areas.Where do you expect Riverside residents to jog, bike, walk, or even hike? Let me guess the bike trail near Fairmount Park? I think not. It's more dangerous now than I ever known it to be and I was born in Riverside and raised here. I've been here 40 years.And what about our health,"

Peggy Matthews	Riverside	CA	92507 US	5/2/2022	"This is ridiculous!!! Isn't there enough warehouses in Riverside area already? Or in the I. E. area period? STOP THE HOUSING AND COMMERCIAL BUILDING ALREADY! You are taking homes from what little of wild life we have left in Riverside. It's bad already that the wild life is having to come deeper into city limits looking for food or a place to make a home. It won't be much longer before our coyote's, road runners, snakes, bob cats, etc end up on the endangered species list because they are being kicked out of their natural habitats and being forced to go deeper into the city, which then puts them at more risk of being killed. It's sad to look around here and see all the unnecessary buildings that once were beautiful wild life areas.Where do you expect Riverside residents to jog, bike, walk, or even hike? Let me guess the bike trail near Fairmount Park? I think not. It's more dangerous now than I ever known it to be and I was born in Riverside and raised here. I've been here 40 years.And what about our health,"
Rose Cook	Riverside	CA	92507 US	5/2/2022	"Riverside is irresponsibly approving warehouse developments adjacent to residential neighborhoods with no regard for the people who live there. They even put one in my neighborhood, right across the street from a middle school. "Legal" doesn't make it right. Nobody invests in a home expecting a massive warehouse next door, with all of the truck traffic and pollution they bring. This has to stop! We need careful, thoughtful planning that respects human health, quality of life, and our environment!"
N V	Panorama City	CA	91402 US	5/4/2022	"Nou Verrett"

M E	Riverside	CA	92508	US	5/4/2022 "Quality of life matters…noise, pollution, traffic congesting our already packed roads, impacting the streets our children travel to school on and family neighborhoods."
Michele Cole	Riverside	CA	92508	US	5/5/2022 "I live in this neighborhood and this will take away the safe area we have. The park, baseball and softball fields won't be safe for our children to play at anymore due to the additional traffic on our streets!"
Marie Rodriguez	Riverside	CA	92508	US	5/5/2022 "I agree with the statements about residents should come first We all knew living here would mean MILITARY planes, and, we learned that the almighty dollar was so important that we were not talked to about 2 ups and 3 Amazon planes every day. So now they want to allow truck traffic right in our front door. Oh they'll say they are going to make it difficult for trucks, but, how many times have you seen trucks make a U-turn on Meridian and go north on Van Buren heading to the 91. We were promised shopping on Van Buren and Barton Instead we get more vacant warehouses. When does it stop. March stopped being an active base before I moved here in 1995. So it's BS about jobs it's about filling up the buildings. Anyone who tries to get around here during school arrivals and departures knows what a mess that is, now add more trucks in the neighborhoods and no one will be able to move. As it is now in the morning's btw Van Buren and Allesandro on Trautwein it can take 30-45 minutes to go 2.5 miles. At th"
James Thomson	Moreno Valley	CA	92555	US	5/6/2022 "The 1st phase already killed most of my view, "The reason I bought it in the 1st place over 20 years ago when it was a Stephens Kangaroo preserve and would never be developed!!!!!"

Sally Quintana	Riverside	CA	92508	US	5/8/2022	"We don’t need any more warehouses! Don’t need the additional traffic!"
Sharon Gate	Riverside	CA	92508	US	5/11/2022	"I don’t want anymore where houses near my home!"
Margaret Gate	Corona	CA	92882	US	5/11/2022	"We need the natural wilderness areas for hiking, biking and wildlife."
Prisela Gonzalez	Riverside	CA	92508	US	5/14/2022	"Because I choose to live here because of the openness and nature around us. Can’t even see the mountains anymore"
Marcine McBride	West Babylon	NY	11704	US	5/15/2022	"Too much development is destroying the ambiance of people's neighborhoods, destroying the environment, and driving wildlife to extinction. It's creating more air pollution, light and noise pollution, soil and wastewater pollution, traffic congestion, heat, and garbage. The people already living there have the rights over the developers who want to destroy this land."
Suzanne Page	Riverside	CA	92508	US	5/15/2022	"Why the constant need to build on open spaces? Drive down Van Buren and you’ll find that there are already too many warehouse’s. The “jobs” are low paying and the environmental impact is too great.Certainly our city leadership can do better."
Kaitlin Munoz	Riverside	CA	92507	US	5/16/2022	"We dont need more warehouses around our home!"
Hector Luna	Nuevo	CA	92567	US	5/16/2022	"No more warehouse"
Crystal Blystone	Moreno Valley	CA	92553	US	5/16/2022	"I am a resident of Moreno Valley and I do not believe building warehouses brings more jobs to Moreno Valley. A warehouse job is not promising and it will only create more people commenting to our city. This is create worst air and road conditions. This is not a good use of land and should not be continued to be built. We already have too many warehouses and some are empty."
Mayra Sigalaandrade	Moreno Valley	CA	92553	US	5/17/2022	"A lot of warehouses but low income salaries"

Gerri Vaughn	Corona	CA	92882	US	5/17/2022	"Gerri vaughn"
Manny DeBaca	Riverside	CA	92506	US	5/17/2022	"I want to keep open spaces for my grandchildren and their kids. Riverside is already to crowded. We need to keep open spaces open."
Teresa Chavez	Moreno Valley	CA	92555	US	5/17/2022	"These warehouses are bringing the value of our homes down, the traffic is insane in the mornings and the make our city ugly!"
Jonathan Mota	Perris	CA	92570	US	5/17/2022	"They should put real things that could make the cities look nice and help out local cities"
Nidia Santiago	Moreno Valley	CA	92555	US	5/17/2022	"I am a concerned and affected resident"
Hector Rodriguez	Moreno Valley	CA	92553	US	5/17/2022	"Hector Rodriguez"
Elias Valencia	Riverside	CA	92505	US	5/17/2022	"Somethings are more important than money!"
Claudia Rodriguez	Bloomington	CA	92316	US	5/17/2022	"Building warehouse worsens quality of air and creates high traffic of semi trucks. The community does not benefit by having tons of warehouses. We want to protect the wildlife and the environment."
Lorena Alvidrez	Moreno Valley	CA	92555	US	5/17/2022	"Because i live near these damn warehouses!! Truck drivers in our neighborhoods!! Absolutely ridiculous"
Davin Tate	Moreno Valley	CA	92557	US	5/17/2022	"I would like more actual restaurants grocery stores shopping malls built instead of warehouses"
Audrey Sanchez	Riverside	CA	92501	US	5/17/2022	"We don't need more empty warehouse. Make more homes parks etc fir the cummunity!"
Bryanna Gonzalez	Nuevo	CA	92567	US	5/17/2022	"It’s bad for our health"
Hector Bautista	Riverside	CA	92508	US	5/17/2022	"Tired of all these new warehouses polluting and bringing traffic and affecting the wild life (birds) out here."

William Jones	Riverside	CA	92509	US	5/17/2022	"i'm signing because there is no reason for these warehouses to destroy what little nature we have left. Riverside sets itself apart from the surrounding cities because it isn't completely overrun by warehouses like Moreno Valley, Fontana, Bloomington, etc. We aren't in need of the extra jobs, and instead we should be focusing on the existing opportunities that lie in our city's long-standing businesses."
Desiree De La Rosa	San Jacinto	CA	92583	US	5/17/2022	"we have enough to warehouses >:(it's bad for the native animals"
Naomi Sampson	Sonora	CA	95370	US	5/18/2022	"I moved away from the area a couple of years ago and whenever I visit I was so excited for all the memories. Hiking! The animals! The overall outdoor experience that I grew up on and every time I visit the fields I once knew are filled with new buildings, housing, warehouses, etc! The Burroughs in Moreno Valley are already being pushed out and losing there homes and now this. When will it end? Children and families deserve the ability to enjoy the outdoors close to home and the animals deserve to keep their homes."
Nancy Garcia	Perris	CA	92571	US	5/18/2022	"WE NEED DIFFERENT TYPES OF BUILDINGS NOT JUST WAREHOUSES ITS SO ANNOYING THAT OTHER CITIES GET NICE RESTAURANTS OR MORE STORES BUT WE GET MORE ANNOYING WAREHOUSES"
Yadira Camarena	Riverside	CA	92508	US	5/19/2022	"No more warehouses. We have too many of them already"
Gerardo Gonzalez	Ontario	CA	91761	US	5/19/2022	"Moreno Valley doesn't need anymore warehouses."
Jason Gonsman	Riverside	CA	92505	US	5/21/2022	"I'm a mountain biker and this area is pack with so many animals and birds."

Sara Amend	Riverside	CA	92508	US	5/21/2022	"We've been walking this area for years. A peaceful getaway from traffic & crowds. Warehouses don't need to take up every available piece of land around us."
Mark Lien	Riverside	CA	92508	US	5/22/2022	"No more warehouses next to our homes. Does this ward pay the highest real estate taxes in the county? Is it not enough to keep the land undeveloped?"
Cheryl Gutierrez	Moreno Valley	CA	92557	US	5/22/2022	"We already have too many warehouses & trucks to go with them!"
Lon Walcker	Riverside	CA	92508	US	5/25/2022	"The mandate to replace lost jobs has been met with millions of square feet of warehouse space recently built on appropriate flat land in the "corridor". This goal has been met and should eliminate any economic pressure for more warehouses. This piece of remaining land that hasn't been built out yet would require massive grading of the hills and valleys to accomodate huge buildings and massive truck traffic, virtually eliminating an entire ecosystem. What sort of city builds vibrant communities around existing open space (federal land) then later decides to put warehouses and trucks in the center of it all?WTF?"
Rigo Estrada	Riverside	CA	92508	US	5/30/2022	"The condition of Van Buren is disgusting, if they can't afford to repave it,they should stop the big rigs from using it and now they want to add more commercial vehicles to itNo thank you"
Renee Hill	Riverside	CA	92503	US	6/1/2022	"I value my health, neighborhood and environment.If we don't stand now we will loose it to the politicians who chose money over people!!!"
Denise Stephenson	Riverside	CA	91767	US	6/11/2022	"I don't want warehouses built in this area. We have enough of them."

Karen Renfro	Riverside	CA	92501	US	6/29/2022	"Warehouses are not compatible with residential, parks, schools, libraries, churches, hospitals, nursing homes, community stores, business districts, farming, ranching, fruit orchards, vineyards, flood zones, earthquake zones, etc. They should be built somewhere far away from urban areas and anywhere nature is known to exert itself in ways destructive to man's intrusions. Truck traffic should be banned in residential and commercial areas."
HARRY KNAPP	Riverside	CA	92507	US	7/13/2022	"I am twenty-five years resident of Riverside. I agree with the goal of this petition."
Karen Kinstley	Riverside	CA	92504	US	8/2/2022	"I feel it is wrong to build on land that wildlife use."
April Glatzel	Riverside	CA	92506	US	8/4/2022	"I'm signing because Riverside has enough warehouses. More warehouses will contribute to more noise and air pollution, traffic, and the desecration of our open wildlife spaces. Enough is enough already!"

Name	City	State	Postal Code	Country	Signed On
Jennifer Larratt-Smith				US	3/29/2022
Faith Mata	Perris	CA	92571	US	3/31/2022
Ernie Reyna	Corona	CA	92879	US	3/31/2022
Magie Lacambra	Phoenix	AZ	85029	US	3/31/2022
Dolores Reyna	Riverside	CA	92508	US	3/31/2022
George Harvilla	Riverside	CA	92598	US	3/31/2022
Cindy Chiek	Fontana	CA	92335	US	3/31/2022
Griselda Contreras	Riverside	CA	92508	US	3/31/2022
Lorraine D	Riverside	CA	92508	US	3/31/2022
Michele Goldman	Riverside	CA	92506	US	3/31/2022
andrea wood	Riverside	CA	92521	US	3/31/2022
Jeff Li	Riverside	CA	92508	US	3/31/2022
Patty Huddleston	Riverside	CA	92506	US	3/31/2022
Lenora Mitchell	Riverside	CA	92508	US	3/31/2022
victoria belova	Riverside	CA	92508	US	3/31/2022
Mike Lien	Riverside	CA	92508	US	3/31/2022
Jeff Rubens	Dallas	CA	92508	US	3/31/2022
Doris Ferguson	Riverside	CA	92508	US	3/31/2022
Susan Nipper	Riverside	CA	92508	US	3/31/2022
Mary Viafora	Riverside	CA	92503	US	3/31/2022
Patrice Niermann	Riverside	CA	92508	US	3/31/2022
Elisa Estrella - Hahn	Riverside	CA	92508	US	3/31/2022
Kristen Lane	Anaheim	CA	92805	US	3/31/2022
Krissy Dominguez	Riverside	CA	92507	US	3/31/2022
Viviane Baerenklau	Riverside	CA	92507	US	3/31/2022
Brenda Parkinson	Riverside	CA	92508	US	3/31/2022
Juan Garcia	Riverside	CA	92508	US	4/1/2022
Angela Cherlin	Diamond Bar		91765	US	4/1/2022
Violet Rugh	Pomona		91766	US	4/1/2022
Ricky Smith	Riverside	CA	92507	US	4/1/2022
Jing Zenteno	Riverside	CA	92508	US	4/1/2022
Oscar Zenteno	Riverside	CA	92508	US	4/1/2022
Christine Martin	Riverside	CA	92506	US	4/1/2022
Mary White	Woodburn	OR	97071	US	4/1/2022
Robert Schmidt	Riverside	CA	92506	US	4/1/2022
Sonia Straley	Riverside	CA	92506	US	4/1/2022
Steven Liao	Riverside	CA	92508	US	4/1/2022
Constance Mlynarski	Riverside	CA	92508	US	4/1/2022
SAMANTHA GONSMAN	RIVERSIDE	CA	92508	US	4/1/2022
Melissa Walker	Fontana	CA	92335	US	4/1/2022
AJ Taylor	Riverside	CA	92508	US	4/1/2022
Jonathan Hagman	Chino Hills	CA	91709	US	4/1/2022
Tina Matar	Riverside	CA	92504	US	4/1/2022
Daniel Jones	Riverside	CA	92508	US	4/1/2022
Jennifer Encineas	Riverside	CA	92508	US	4/1/2022
Kevin Castellanos	Riverside	CA	92503	US	4/1/2022

Adam Kaluba	Burleson		76028	US	4/1/2022
Veronica Juarez	Riverside	CA	92508	US	4/1/2022
Aloaf Walker	Corona	CA	92508	US	4/2/2022
Nikae Carter	Perris	CA	92570	US	4/2/2022
Nicole Prado	Riverside	CA	92505	US	4/2/2022
Thomas Kirkpatrick	Riverside	CA	92508	US	4/2/2022
Nick Kincaid	Riverside	CA	92508	US	4/2/2022
Corina Diaz	Riverside	CA	92506	US	4/2/2022
Beverly Arias	Riverside	CA	92504	US	4/2/2022
Eduardo Jimenez	Riverside	CA	92508	US	4/2/2022
Nicole Jimenez	Riverside	CA	92506	US	4/2/2022
Nicole Greenwood	Riverside	CA	92504	US	4/2/2022
Shanin Patel	Riverside	CA	92508	US	4/2/2022
Cesar Reyes	Riverside	CA	92507	US	4/2/2022
Ronald Peters	Riverside	CA	92508	US	4/2/2022
Jake Shiba	Lake Elsinore	CA	92587	US	4/2/2022
Karie Jundanian	Riverside	CA	92508	US	4/2/2022
Cheryl Voss	Riverside	CA	92506	US	4/2/2022
Alexander Hernandez	Riverside	CA	92508	US	4/2/2022
Kathryn Zachwieja	Fontana	CA	92335	US	4/2/2022
Janet Anderson	Riverside	CA	92503	US	4/2/2022
James Mcdermott	Los Angeles	CA	90059	US	4/2/2022
Tony D	Riverside	CA	92508	US	4/2/2022
Rebecca Ruiz	Los Angeles	CA	90012	US	4/2/2022
Esther Cervantes	Riverside	CA	92507	US	4/2/2022
Cory Herbert	Riverside	CA	92507	US	4/2/2022
Theresa Longo	Riverside	CA	92505	US	4/2/2022
Steve Parker	Riverside	CA	92508	US	4/2/2022
Robyn Flores	Riverside	CA	92508	US	4/2/2022
Jiovanni Hernandez	Mead valley	CA	90220	US	4/2/2022
Michelle Smith	Southfield		48086	US	4/2/2022
sharon gutierrez	Riverside	CA	92505	US	4/2/2022
Karissa Hammar	Riverside	CA	92501	US	4/2/2022
Terrie Vanbaarsel	Riverside	CA	92506	US	4/2/2022
Terri Meine	Perris	CA	92571	US	4/2/2022
Kelly Wrightstone	Riverside	CA	92508	US	4/2/2022
MARisol Lomeli	Woodland Hills	CA	91367	US	4/2/2022
Cindi Robertson	Lake Forest	CA	92630	US	4/2/2022
Milo Rivera	Riverside	CA	92508	US	4/2/2022
Jennifer Gill	Riverside	CA	92508	US	4/2/2022
Brian Robertson	Riverside	CA	92508	US	4/2/2022
Dallas Johnson	Corona	CA	92880	US	4/2/2022
Melissa Zimmerman	Riverside	CA	92508	US	4/2/2022
Natalie Brooks	Reno	NV	89502	US	4/2/2022
Nancy Elkhoury	Riverside	CA	92509	US	4/2/2022
Nicole Sparks	Riverside	CA	92505	US	4/2/2022
Yolande Ruzak	San Diego	CA	92109	US	4/2/2022

Jennifer Stoever	Riverside	CA	92508	US	4/2/2022
Patricia Olivos	Corona	CA	92881	US	4/2/2022
Beverly Chapin	Riverside	CA	92509	US	4/2/2022
Tara Williamson	Moreno Valley	CA	92555	US	4/2/2022
Lorraine Evans	Riverside	CA	92509	US	4/2/2022
Robin Thomas	Riverside	CA	92505	US	4/2/2022
Tamara Escobar	Moreno Valley	CA	92557	US	4/2/2022
Christi Carr	Colton	CA	92595	US	4/2/2022
Andre Elkhoury	Riverside	CA	92506	US	4/2/2022
Elizabeth Young	Riverside	CA	92508	US	4/2/2022
Anne Kitchin	Bantam	CT	6750	US	4/2/2022
Idiana Chavez	Riverside	CA	92516	US	4/2/2022
Alfredo Vasquez	Riverside	CA	92503	US	4/2/2022
janet salgado	Kennewick		99336	US	4/2/2022
Jennifer Shetler	Riverside	CA	92503	US	4/2/2022
Sheri Potter	Riverside	CA	92508	US	4/2/2022
Lesley Kantola	Riverside	CA	92508	US	4/2/2022
Angela Hernandez	Los Angeles	CA	90004	US	4/2/2022
Tamera Stephens	riverside	CA	93506	US	4/2/2022
Priscilla Adair	Riverside	CA	92508	US	4/2/2022
serena higuera	mira loma	CA	91752	US	4/2/2022
America Burgess	Pomona	CA	91766	US	4/2/2022
Susan Broyles	Riverside	CA	92507	US	4/2/2022
Ana Newbold	Hemet	CA	92543	US	4/2/2022
Arias Vanessa	Lake Elsinore	CA	92530	US	4/2/2022
Bonni Johnson	Riverside	CA	92506	US	4/2/2022
charissa adams	riverside	CA	92504	US	4/2/2022
Cathryn Harris	Riverside	CA	92504	US	4/2/2022
Lalit M Maharjan	Riverside	CA	92508	US	4/2/2022
Regina Flores	Riverside	CA	92503	US	4/2/2022
Ben Weaver	Riverside	CA	92508	US	4/2/2022
Kim Vandermeulen	Riverside	CA	92508	US	4/2/2022
Jen Kammerer	Riverside	CA	92508	US	4/2/2022
Angelica Garcia	Riverside	CA	92506	US	4/2/2022
Rose Daniels	Temecula	CA	92591	US	4/2/2022
Gloria Dominguez	Los Angeles	CA	90001	US	4/2/2022
Kathy Rhinrhsrt	Riverside	CA	92508	US	4/2/2022
Vivian Rumsey	Riverside	CA	92506	US	4/2/2022
Benjamin Rhinehart	Riverside	CA	92504	US	4/3/2022
Nicole Smith	Riverside	CA	92506	US	4/3/2022
Robin Adair	Riverside	CA	92508	US	4/3/2022
Stephanie Holt	Riverside	CA	92506	US	4/3/2022
Robert Brammer	Riverside	CA	92508	US	4/3/2022
Jennifer Zamora	Riverside	CA	92508	US	4/3/2022
Lauren Garcia	Riverside	CA	92503	US	4/3/2022
Elissia Magana	Highland	CA	92346	US	4/3/2022
Maria Alvarado	Riverside	CA	92506	US	4/3/2022

Tracie Rodrigues	Riverside	CA	92507	US	4/3/2022
Biji Jacob		CA		US	4/3/2022
Hayley Sims-Santana	Los Angeles	CA	90012	US	4/3/2022
Alice Markey	Hattiesburg		39402	US	4/3/2022
Richard Jenkins	Riverside	CA	92508-6185	US	4/3/2022
Lily Jones	Riverside	CA	92507	US	4/3/2022
Michele Weiler	Santa Ana	CA	92706	US	4/3/2022
Jeremy Goldman	Riverside	CA	92506	US	4/3/2022
ROSALIE GERHARTZ	Riverside	CA	92504	US	4/3/2022
Colleen Naulty	Santa Ana	CA	92705	US	4/3/2022
Bryan Smith	Riverside	CA	92506	US	4/3/2022
Frederick Jessica	Perris	CA	92570	US	4/3/2022
sherry miller	Riverside	CA	92508	US	4/3/2022
Mercedes Villegas	Riverside	CA	92508	US	4/3/2022
Janis Pressley	Perris	CA	92518	US	4/3/2022
tina ely	Corona	CA	92882	US	4/3/2022
Kathleen Rapoza	Riverside	CA	92505	US	4/3/2022
Erica Mora	Riverside	CA	92508	US	4/3/2022
Alyssa Lechuga	Riverside	CA	92508	US	4/3/2022
Ruth Rembert	Riverside	CA	92506	US	4/3/2022
Mike Kammerer	Riverside	CA	92508	US	4/3/2022
Toni Landau	Murrieta	CA	92562	US	4/3/2022
Sara Amend	Riverside	CA	92508	US	4/3/2022
Melanie Dockett	Riverside	CA	92508	US	4/3/2022
Noelle Chamberlain	Riverside	CA	92501	US	4/3/2022
Linda TingleyRivera	Riverside	CA	92508	US	4/3/2022
Stephen Magnussen	Rocklin	CA	95765	US	4/3/2022
H Alan Braswell	Riverside	CA	92508	US	4/3/2022
Sylvia Gamboa	Riverside	CA	92503	US	4/3/2022
Tia Ballesteros	Riverside	CA	92508	US	4/3/2022
Diane Murdock	Riverside	CA	92503	US	4/4/2022
Michelle Ochoa	Riverside	CA	92509	US	4/4/2022
Stacy Gavino	Riverside	CA	92508	US	4/4/2022
Melissa Murguia	Las Vegas	NV	89108	US	4/4/2022
Alice Musumba	Riverside	CA	92508	US	4/4/2022
Christy Dunn	Riverside	CA	92508	US	4/4/2022
Nathaly Ortiz	Riverside	CA	92506	US	4/4/2022
Chandana Vasireddy	Riverside	CA	92508	US	4/4/2022
Susan Cadena	Cathedral City	CA	92234	US	4/4/2022
Emily Wattez	Vancouver		98682	US	4/4/2022
Tom Parkinson	Orange	CA	92508	US	4/4/2022
Rachel Behar	Riverside	CA	92508	US	4/4/2022
Claudia Cervantes	Riverside	CA	92506	US	4/4/2022
Katie Gonzalez	Riverside	CA	92508	US	4/4/2022
Tuoya Aleteng	Riverside	CA	92508	US	4/4/2022
Christy Sierra	Riverside	CA	92507	US	4/4/2022
Selena Garcia	Riverside	CA	92509	US	4/4/2022

James Jesser	Riverside	CA	92506	US	4/4/2022
Laura Foster	Riverside	CA	92501	US	4/4/2022
Lorenzo Ramirez	Riverside	CA	92509	US	4/4/2022
Alberto Prado	Riverside	CA	92507	US	4/4/2022
Kelly Krzyska	Fremont	CA	94536	US	4/4/2022
Vicki Perizzolo	Riverside	CA	92507	US	4/4/2022
Gina Wagner	Riverside		92503	US	4/4/2022
Doran Valerie	Riverside	CA	92508	US	4/4/2022
Cindy Pendleton	Eagle Mountain	UT	84005	US	4/4/2022
Michael McCarthy	Riverside	CA	92508	US	4/4/2022
Bernadette Dunne	Moreno Valley	CA	92557	US	4/4/2022
Lindy Benitez-Thompson	Norco	CA	92860	US	4/4/2022
Marisol Salvatierra	Compton	CA	90222	US	4/4/2022
Mike Acosta	Riverside	CA	92506	US	4/4/2022
Maribel Nunez	Corona	CA	92880	US	4/4/2022
Karina Pereira Marquez				US	4/4/2022
Charles Johannsen	Riverside	CA	92504	US	4/4/2022
Elizabeth Glover	Riverside	CA	92507	US	4/4/2022
Susan Jundanian	Aliso Viejo	CA	92656	US	4/4/2022
Elizabeth Sterling-Baresi	Riverside	CA	92509	US	4/4/2022
Carmen Adel	Lake Forest	CA	92630	US	4/5/2022
Mikayla Bizer	Tracy		95377	US	4/5/2022
Dianna Hentzschel	Perris	CA	92571	US	4/5/2022
Michele Grisham	Riverside	CA	92503	US	4/5/2022
Anthony Gonzales	Riverside	CA	92508	US	4/5/2022
Jonathan Mizer	Riverside	CA	92508	US	4/5/2022
Heinrich Pastor	Corona	CA	92879	US	4/5/2022
Valerie Hernandez	Moreno Valley	CA	92557	US	4/5/2022
Hunter Tank	Riverside	CA	92508	US	4/5/2022
Sherry Marshall	Riverside	CA	92653	US	4/5/2022
Juan Martinez	Riverside	CA	92509	US	4/5/2022
Monica McGuire	Los Angeles	CA	90036	US	4/5/2022
Michelle Erdodi	Riverside	CA	92508	US	4/5/2022
David Barragan	Riverside	CA	92504	US	4/5/2022
Donna Kirchoff	Riverside	CA	92506	US	4/5/2022
Tracy Newton	Laguna Beach	CA	92651	US	4/5/2022
Erika Juarez	West	TX	76661	US	4/5/2022
Cheryl Macias	Redlands	CA	92373	US	4/5/2022
Terri K Jones	Riverside	CA	92501	US	4/5/2022
Ajay Shah	Riverside	CA	92508	US	4/5/2022
Ana Ramirez	Ontario	CA	91761	US	4/5/2022
walter torres	Los Angeles	CA	90043	US	4/5/2022
Alex Ramos	Los Angeles	CA	90060	US	4/5/2022
karina jump	riverside	CA	92506	US	4/5/2022
Melissa Suarez	Riverside	CA	92508	US	4/5/2022
Tracy Schabacker	Salem		53168	US	4/5/2022
Miguel Munoz	Riverside	CA	92508	US	4/5/2022

Jason Fyda	Corona	CA	92878	US	4/5/2022
Holly Fyda	Riverside	CA	92504	US	4/5/2022
Carmen Jimenez	Los Angeles	CA	90001	US	4/5/2022
Carmen Sanchez	Riverside	CA	92507	US	4/5/2022
Jeffery Patch	Norco	CA	92860	US	4/5/2022
Jenny Baiza	Crown Point		46307	US	4/5/2022
Kathy Barton	Ketchum	ID	83340	US	4/5/2022
Danny Macias	Riverside	CA	92505	US	4/5/2022
Galina Eagle	Riverside	CA	92506	US	4/5/2022
Lynn Larsen	Riverside	CA	92508	US	4/5/2022
Rafael Jimenez	Riverside	CA	92508	US	4/5/2022
Fera Momtaz	Riverside	CA	92508	US	4/6/2022
Mark Nemetz	Riverside	CA	92508	US	4/6/2022
Jennifer Guzman	Riverside	CA	92505	US	4/6/2022
Robert Walker	Riverside	CA	92503	US	4/6/2022
Liz Harmer	Riverside	CA	92507	US	4/6/2022
Chris Stock	Riverside	CA	92508	US	4/6/2022
Kimberly Stock	Riverside	CA	92508	US	4/6/2022
Licia Moss	Riverside	CA	92508	US	4/6/2022
Sylvia Hernandez	Las Vegas	NV	89104	US	4/6/2022
Carlos Lliguin	Riverside	CA	92508	US	4/6/2022
Lisa Romero	Riverside	CA	92508	US	4/6/2022
Jessica Sorto	Los Angeles	CA	90037	US	4/6/2022
Erika Jimenez	Los Angeles	CA	90017	US	4/6/2022
Christie Miller	Riverside	CA	92508	US	4/6/2022
michele maxwell	Mission Viejo	CA	92692	US	4/6/2022
angelina ramirez	Riverside	CA	92504	US	4/6/2022
Andre Richard	Desert hot springs	CA	92240	US	4/6/2022
Kyle Feild	Shreveport	LA	71101	US	4/6/2022
Renee goraleski	Riverside	CA	92508	US	4/6/2022
Daniel Macias	Redlands	CA	92373	US	4/6/2022
Arthur Del Rio	Riverside	CA	92506	US	4/6/2022
Cecilia Jiménez	Riverside	CA	92508	US	4/6/2022
Camille Chustz	Prairieville		70769	US	4/6/2022
Suzanne Pearson	Riverside	CA	92508	US	4/6/2022
Kristin Haasis	Riverside	CA	92508	US	4/6/2022
Tere Casas	Riverside	CA	92506	US	4/6/2022
Kerri Torres	Bronx		10454	US	4/6/2022
Stephanie Flores	North Hollywood	CA	91605	US	4/6/2022
Duffy Atkinson	Riverside	CA	92506	US	4/6/2022
Michael Wilson	Riverside	CA	92509	US	4/6/2022
Sydney Mousner	Corona	CA	92880	US	4/6/2022
Chit lau Yeung	San Jose		95129	US	4/6/2022
Angelica Rodriguez	Riverside	CA	92503	US	4/6/2022
Javier Elizarraraz	Yorba Linda	CA	92886	US	4/6/2022
Kaitlyn Saner	Riverside	CA	92503	US	4/6/2022
Sara Wood	Fontana	CA	92503	US	4/6/2022

Matthew Saner	Riverside	CA	92504	US	4/6/2022
Dan De Yo	Yorba Linda		92886	US	4/6/2022
Tonnette LaMier-Goulas	Riverside	CA	92504	US	4/7/2022
Kristine Jennings	Riverside	CA	92503	US	4/7/2022
Krystal Mundell	Kemah		77565	US	4/7/2022
Abdallah Karim	Los Angeles	CA	90060	US	4/7/2022
Mike Green	Long Beach	CA	90801	US	4/7/2022
Dina K	Riverside	CA	90022	US	4/7/2022
Zeinab Raed	Los Angeles	CA	90022	US	4/7/2022
John Hagmann	Riverside	CA	92506	US	4/7/2022
Daisy Hernandez	Riverside	CA	92506	US	4/7/2022
Al Hemdan	Alhambra	CA	91801	US	4/7/2022
Lisa Wallace	Riverside	CA	92504	US	4/7/2022
Valerie Kieng	Riverside	CA	92508	US	4/7/2022
Alanna Mitchell	Riverside	CA	92508	US	4/7/2022
Gaye Marianes-Fox	Riverside	CA	92508	US	4/7/2022
Damon Bywater	Riverside	CA	92508	US	4/7/2022
Amber Peaslee	Riverside	CA	92508	US	4/7/2022
Carey Pund	Riverside	CA	92503	US	4/7/2022
Sumana Pasala	Riverside	CA	92508	US	4/7/2022
Kirstie Kranz	Riverside	CA	92508	US	4/7/2022
Staci Howard	Riverside	CA	92506	US	4/7/2022
Pam Greer	Riverside	CA	92571	US	4/7/2022
Joseph Buhr	Riverside	CA	92506	US	4/7/2022
dawn villavicencio	Riverside	CA	92508	US	4/7/2022
Tammy Rendon	Riverside	CA	92508	US	4/7/2022
Victoria Paz	Riverside	CA	92505	US	4/7/2022
Sara Milstead	Riverside		92501	US	4/7/2022
ang mum	Riverside	CA	92508	US	4/7/2022
Rick Lloyd	Riverside	CA	92508	US	4/7/2022
Christine Langdon	Riverside	CA	92506	US	4/7/2022
Kristy Bauer	Riverside	CA	92508	US	4/7/2022
Chris Arevalo	Riverside	CA	92505	US	4/7/2022
Benjamin Hernandez	Riverside	CA	92503	US	4/7/2022
E Hicks	Riverside	CA	92508	US	4/7/2022
Carrie Poptelecan	Riverside	CA	92508	US	4/7/2022
Helena Craig	Riverside	CA	92587	US	4/7/2022
Sarah Chapa	Riverside	CA	92508	US	4/7/2022
Laura Williams	Riverside	CA	92508	US	4/7/2022
Maria Garde				US	4/7/2022
Roseann Langley-Walden	Winchester	CA	92596	US	4/7/2022
Chelsea Ortega	Riverside	CA	92508	US	4/7/2022
Lizeth Hernandez	Riverside Ontario	CA	92508	US	4/7/2022
Molly Brooke Becker	Riverside	CA	92505	US	4/7/2022
Rob Donnelly	Riverside	CA	92506	US	4/7/2022
Mary Salem	Riverside	CA	92508	US	4/7/2022
Amanda Gomez	Riverside	CA	92508	US	4/7/2022

Susan Lacina	Riverside	CA	92506	US	4/7/2022
Farrah Stewart	Riverside	CA	92508	US	4/8/2022
Carol Vansant	Riverside	CA	92508	US	4/8/2022
Melissa Hersman	Riverside	CA	92508	US	4/8/2022
Whitney Henderson	Riverside	CA	92503	US	4/8/2022
Mike Hersman	Riverside	CA	92508	US	4/8/2022
Sandra Richards	Riverside	CA	92507	US	4/8/2022
Patricia Beckett	San Jacinto	CA	92582	US	4/8/2022
Jill Whitlock	Riverside	CA	92508	US	4/8/2022
Robert Whitlock	Riverside	CA	92508	US	4/8/2022
Shafika Khaleel	Riverside	CA	92508	US	4/8/2022
Gabriela Mendez	Riverside	CA	92503	US	4/8/2022
Varsha Agrawal	Riverside	CA	92508	US	4/8/2022
Gina Binhimaid	Pompom121@live.com	CA	92508	US	4/8/2022
Brenda Shearer	Riverside	CA	92508	US	4/8/2022
Chris Shearer	Riverside	CA	92508	US	4/8/2022
Sireesha Goli	Riverside	CA	92508	US	4/8/2022
Savvas Eulgem	Riverside	CA	92508	US	4/8/2022
Kevin Shearer	Irvine	CA	92612	US	4/8/2022
Ricardo Decker	Riverside	CA	92506	US	4/8/2022
Chris Shearer	Riverside	CA	92507	US	4/8/2022
Wendy Callis	Crestline	CA	92325	US	4/8/2022
Alma Cooper	houston	TX	77092	US	4/8/2022
Kaeleb Beck	Conroe		77304	US	4/8/2022
Nikolaos Eulgem	Riverside	CA	92506	US	4/8/2022
Srikanth Goli	Riverside	CA	92508	US	4/8/2022
Olivia Sanchez	Riverside	CA	92507	US	4/8/2022
Adolfo Saldana	Riverside	CA	92503	US	4/8/2022
Katie Durocher	Riverside	CA	92506	US	4/8/2022
Amy Bonczewski	Riverside	CA	92506	US	4/8/2022
Colby Melo	Riverside	CA	92508	US	4/8/2022
Hope Becker	Riverside	CA	92503	US	4/8/2022
Joel Sachs	Los Angeles	CA	90020	US	4/8/2022
Davis Rush	Riverside	CA	92509	US	4/8/2022
Emily Margeson	Riverside	CA	92505	US	4/8/2022
Diane Sinclair	Riverside	CA	92598	US	4/8/2022
Michael Kaudze	Riverside	CA	92505	US	4/8/2022
Lopez Daniel	Riverside	CA	92508	US	4/8/2022
Tiffany Lopez	Riverside	CA	92508	US	4/8/2022
Heather Schaefer	Fontana	CA	92336	US	4/8/2022
Lily Cacheiro	Riverside	CA	92503	US	4/8/2022
Gerald Luppino	Riverside	CA	92506	US	4/8/2022
Terry Smith	Los Angeles	CA	90026	US	4/8/2022
Kendra Sotelo	Riverside	CA	92506	US	4/8/2022
Haroun Khaleel	Berkeley	CA	94705	US	4/8/2022
Brian Geiger	Riverside	CA	92506	US	4/8/2022
Laura Sosa	Whittier	CA	90606	US	4/8/2022

bibiana maldonado	san bernardino	CA	92410	US	4/8/2022
Kelli Barraza	Riverside	CA	92508	US	4/8/2022
Leonardo Morales	Riverside	CA	92508	US	4/8/2022
Rodriguez,Norma David W. Rodriguez	Riverside	CA	92504	US	4/8/2022
Cindy Chavez	Riverside	CA	92509	US	4/8/2022
Denise Torres	San Bernardino	CA	92410	US	4/8/2022
Richard Stalder	Riverside	CA	92507	US	4/8/2022
Mia Rew	Riverside	CA	92508	US	4/8/2022
Lanie Bavier	Riverside	CA	92508	US	4/8/2022
Robert Bavier	Riverside	CA	92508	US	4/8/2022
Kathryn Carrillo	columbia	CA	65203	US	4/8/2022
Victoria Bavier				US	4/8/2022
Hannah Carrillo	Riverside	CA	92503	US	4/8/2022
Brandy Lambert	Riverside	CA	92508	US	4/8/2022
Lauren Peurifoy	Lynchburg	VA	24502	US	4/8/2022
Zach Canfield	Riverside	CA	92508	US	4/8/2022
Sarah Romero	Moreno Valley	CA	92555	US	4/8/2022
jessica Olmos	Rialto	CA	92376	US	4/8/2022
Austin St. George	Riverside	CA	92508	US	4/8/2022
Christian Tzul	Houston		77057	US	4/8/2022
Newman Cindy	Las Vegas	NV	89109	US	4/8/2022
Nikki Mendoza	Claremont	CA	91711	US	4/8/2022
Kellon Jump	Riverside	CA	92506	US	4/8/2022
Jesenia Wilson	Sherman Oaks	CA	91403	US	4/8/2022
Esme Padilla	Corona	CA	92880	US	4/9/2022
Tyler Lowell	Phoenix	AZ	85032	US	4/9/2022
Frank Paz	Riverside	CA	92508	US	4/9/2022
Bill De La Hoya	Riverside	CA	92506	US	4/9/2022
Tatum Lakshin	Santa Barbara	CA	93109	US	4/9/2022
isabelle Gomez	Riverside	CA	92509	US	4/9/2022
Alese Cameron	Riverside	CA	92503	US	4/9/2022
Siena van Olden	Santa Barbara	CA	94544	US	4/9/2022
Jacob Carlson	Norco	CA	92508	US	4/9/2022
Terry Oneill	Riverside	CA	92506	US	4/9/2022
sylvia Oneill	Riverside	CA	92506	US	4/9/2022
Nicolette Rohr	Riverside	CA	92506	US	4/9/2022
Trinity Vriend	Riverside	CA	92506	US	4/9/2022
Shyanne Duncan	Riverside	CA	92503	US	4/9/2022
Matthew Cortez	Riverside	CA	92507	US	4/9/2022
Brooklyn Sanchez	Banning	CA	92220	US	4/9/2022
Mohamad Karim	Los Angeles	CA	90022	US	4/9/2022
Allison Weaver	Riverside	CA	92505	US	4/9/2022
corey thomas	riverside	CA	92801	US	4/9/2022
Cameron Harrington	Riverside	CA	92508	US	4/9/2022
Madison Franco	Riverside	CA	92506	US	4/9/2022
Maddie Shay	Corona	CA	92880	US	4/9/2022
Natalie Lopez	Riverside	CA	92504	US	4/9/2022

Citlaly Camargo	Chicago		60639	US	4/9/2022
krusti Saldana	Racine		53403	US	4/9/2022
Chris moore	Riverside	CA	92508	US	4/9/2022
Rory Scalf	Corona	CA	92880	US	4/9/2022
Erin Mailhot	Riverside	CA	92508	US	4/9/2022
Clark Krystal	Riverside	CA	92508	US	4/9/2022
libby bearden	Imperial		63052	US	4/9/2022
Jeri Schwebs	Riverside	CA	92508	US	4/9/2022
Sofia Corradetti	Fort Lauderdale		33317	US	4/9/2022
Meghan Meschon	Riverside	CA	92508	US	4/9/2022
Henry Moore	Riverside	CA	92508	US	4/9/2022
Gabriel Ramirez	Riverside	CA	92508	US	4/10/2022
Charlene Simmons	Riverside	CA	92508	US	4/10/2022
Dina Khoury	Riverside	CA	92508	US	4/10/2022
Alec Milbourne	Riverside	CA	92508	US	4/10/2022
Jordan Greenfield	Buford		30519	US	4/10/2022
Robby B3ll4s			10954	US	4/10/2022
Mark Lien	Riverside	CA	92508	US	4/10/2022
Sydney Buckman	Denver		80503	US	4/10/2022
Kay Gibson	Salem		47167	US	4/10/2022
Alejandra Arechiga	Riverside	CA	92501	US	4/10/2022
Jazmine Herrera	Los Angeles	CA	90059	US	4/10/2022
Dylan Jones	Houston		77098	US	4/10/2022
nico rojas	Riverside	CA	92506	US	4/10/2022
Melody Clark	Riverside	CA	92506	US	4/10/2022
louis thomas	Fort Mill		29715	US	4/11/2022
Hannah Harlow	Orange	CA	92868	US	4/11/2022
sonia ramirez	Riverside	CA	92508	US	4/11/2022
Suzie Goodson	Riverside	CA	92508	US	4/11/2022
M E	Riverside	CA	92508	US	4/11/2022
Mirna Lozano	Riverside	CA	92501	US	4/11/2022
emo momo				US	4/11/2022
Antonett Charletta	Riverside	CA	92508	US	4/11/2022
William Tibbetts	Riverside	CA	92508	US	4/11/2022
Kerry McCoy	Riverside	CA	92505	US	4/11/2022
Rebecca Kessler	Riverside	CA	92508	US	4/11/2022
Tess Reznick	Riverside	CA	92506	US	4/11/2022
Cheyenne Norris	Leonardtown		20650	US	4/11/2022
Sylvia Ortiz	Riverside	CA	92508	US	4/11/2022
Brooke Fuller	New York		10118	US	4/11/2022
Terry Byland	Riverside	CA	92509	US	4/11/2022
JENNIFER PIGEON	Riverside	CA	92508	US	4/12/2022
Kevin Goodson	Riverside	CA	92509	US	4/12/2022
Charlie LaChance	Corona	CA	92882	US	4/12/2022
Joshua McCoy	Riverside	CA	92508	US	4/12/2022
Thomas Hennessy	Brooklyn		11226	US	4/12/2022
Samer Mirfiq	New Orleans		70118	US	4/12/2022

Wilbert Andrews	Bronx		10461	US	4/12/2022
Hannah Staub	Geneseo		61254	US	4/12/2022
Jonathan Ustun	Alexandria	VA	22308	US	4/12/2022
megha arraj	leeds		1053	US	4/12/2022
Ann Keskula	Moncks Corner		29461	US	4/13/2022
Anthony Scrimenti	Guilderland		12084	US	4/13/2022
Hunter Darling	Grant		35747	US	4/13/2022
christian craddock	Riverside	CA	92508	US	4/13/2022
Gladys Ponce	Bloomington	CA	92316	US	4/13/2022
Jackie Martinez	Moreno Valley	CA	92553	US	4/13/2022
Rodney Gilmore	Riverside	CA	92508	US	4/13/2022
Tana P.				US	4/13/2022
Melissa Straber	Whiteland		46184	US	4/13/2022
Chih chun Lee chen	Riverside	CA	92508	US	4/13/2022
Charlotte Taylor	Perris	CA	92571	US	4/13/2022
K Doty	Riverside	CA	92508	US	4/14/2022
Matt Silveous	Riverside	CA	92508	US	4/14/2022
David Reznick	Riverside	CA	92506	US	4/14/2022
Makayla Groves	Indianapolis		46217	US	4/14/2022
Charlotte Callegari	Riverside	CA	92521	US	4/14/2022
Doug Bailey	Riverside	CA	92503	US	4/14/2022
Angel Calleja	Fontana	CA	92335	US	4/14/2022
Mohamedali Ismailjee	Riverside	CA	92506	US	4/14/2022
Manuel Paschinger	Riverside	CA	92376	US	4/14/2022
emery hughes	Belleville		48111	US	4/14/2022
Richard Gate	Los Angeles	CA	92503	US	4/14/2022
Shamades Raves	Marysville		43040	US	4/14/2022
Gary Williams	Moreno Valley	CA	92555	US	4/14/2022
Kevin Thompson	Moreno Valley	CA	92557	US	4/14/2022
Dan Bartlett	Riverside	CA	92506	US	4/14/2022
Michael Sullivan	Oakland	CA	94608	US	4/14/2022
Pete Elliott	Riverside	CA	92508	US	4/14/2022
Holly Greywood	Riverside	CA	92507	US	4/14/2022
Amber weatherly	Little rock		72206	US	4/15/2022
Aleshia Wall	Louisa		23093	US	4/15/2022
Joe Taylor	Bloomington	CA	92316	US	4/15/2022
Maddison Carrell	Anderson		46013	US	4/15/2022
Brian Wardle	Riverside	CA	92508	US	4/15/2022
Daniel Johnson	Riverside	CA	92508	US	4/15/2022
Natalie Biss	Windermere		34786	US	4/15/2022
Michelle Broman	Davie		33314	US	4/15/2022
Ashraf Fawzy	Bayonne	NJ	7002	US	4/15/2022
Rosalba Garcia	Riverside	CA	92508	US	4/16/2022
Isaiah Stanton	Julian		16844	US	4/16/2022
Diane Arndt	Riverside	CA	92508	US	4/16/2022
Jeannine SABEL	Riverside	CA	92506	US	4/17/2022
Yesenia Nichols	Riverside	CA	92505	US	4/17/2022

Jared Nichols	Riverside	CA	92505	US	4/17/2022
Patricia Gonzalez	Quail Valley	CA	92587	US	4/17/2022
Elizabeth Basulto	Corona	CA	92880	US	4/17/2022
Isabela kercado	Riverside	CA	92503	US	4/17/2022
Guadalupe Lara	Riverside	CA	92503	US	4/17/2022
Debra Maddox	Riverside	CA	92508	US	4/17/2022
Ellison Kremer	Eden Prairie		55347	US	4/18/2022
Mila Underwood	Lebanon		45036	US	4/18/2022
Mckenna Garner	Russellville		72801	US	4/18/2022
Philip Levonian				US	4/18/2022
Mikela Davis	Buena Vista		24416	US	4/18/2022
Jackie Santullo	Alexandria		22309	US	4/19/2022
Kerri Elaine	Riverside	CA	92508	US	4/19/2022
Amanda Johnson	Riverside	CA	92503	US	4/19/2022
Christina Hales	Riverside	CA	92508	US	4/19/2022
Shaun Stone	Riverside	CA	92508	US	4/19/2022
gary kwong	Riverside	CA	92509	US	4/19/2022
Lane Gleason	Riverside	CA	92508	US	4/19/2022
Salman Asif	Riverside	CA	92507	US	4/19/2022
Jessica Puente	Riverside	CA	92508	US	4/19/2022
GUIYAN SUN	Riverside	CA	92508	US	4/19/2022
Monique Whye	Riverside	CA	92507	US	4/19/2022
Brian Sanchez	RIVERSIDE	CA	92508	US	4/19/2022
Katrina Zelenka	Riverside	CA	92508	US	4/19/2022
Veronica Lopez-Perez	Riverside	CA	92508	US	4/19/2022
Larry Renick	Riverside	CA	92508	US	4/19/2022
David Jacobo	Riverside	CA	92509	US	4/19/2022
Richard McIntosh	Riverside	CA	92508	US	4/19/2022
Maren Chediak	Riverside	CA	92508	US	4/19/2022
Christopher Moffitt	Riverside	CA	92508	US	4/19/2022
Gabriela Espinoza	Riverside	CA	92508	US	4/19/2022
Dongwon Lee	Riverside	CA	92508	US	4/19/2022
ALN RAO	RIVERSIDE	CA	92521	US	4/19/2022
Raymond Mesler	Riverside	CA	92508	US	4/19/2022
Joy Gonazaga	Riverside	CA	92508	US	4/19/2022
Yamen Wanis	Riverside	CA	92508	US	4/19/2022
Emma Felix	San Bernardino	CA	92410	US	4/19/2022
Barbara Kerr	Riverside	CA	92508	US	4/19/2022
Shirley Korsek	Corona	CA	92880	US	4/19/2022
Lindsay Medcraft	Riverside	CA	92508	US	4/19/2022
Jennifer Barto	Riverside	CA	92508	US	4/19/2022
Todd Royer	Riverside	CA	92508	US	4/19/2022
Aaron Rolens	Riverside	CA	92508	US	4/19/2022
Jing Zenteno	Riverside	CA	92508	US	4/19/2022
SOOJIN LEE	RIVERSIDE	CA	92508	US	4/20/2022
Jill McCormick	Riverside	CA	92505	US	4/20/2022
Isa Akcayoglu	Fontana	CA	92335	US	4/20/2022

Richard Triggs	Riverside	CA	92508	US	4/20/2022
Sandi Cabrera	Riverside	CA	92508	US	4/20/2022
Claudia Alejandre	Riverside	CA	92508	US	4/20/2022
Carrie Anderson	Nashville	TN	37211	US	4/20/2022
Jennifer Clifton-Sullivan	Riverside	CA	92508	US	4/20/2022
Grisel Gonzalez	Los Angeles	CA	90003	US	4/20/2022
Jaime Estrada	Riverside	CA	92505	US	4/20/2022
Sonia Estrada	Riverside	CA	92508	US	4/20/2022
Debbie Losoya	Riverside	CA	92505	US	4/20/2022
Debbie W	Perris	CA	92570	US	4/20/2022
Daffne Ruiz	Riverside	CA	92508	US	4/20/2022
Irene Werley	Riverside	CA	92521	US	4/20/2022
Eva Perez	Riverside	CA	92508	US	4/20/2022
Roger Deleon	Los Angeles	CA	90047	US	4/20/2022
Mike Dearman	Riverside	CA	92509	US	4/20/2022
Pam Euker	Riverside	CA	92503	US	4/20/2022
Erin Krizek	Riverside	CA	92508	US	4/20/2022
Travis Tyson	Riverside	CA	92508	US	4/20/2022
Brenda Wright	Riverside	CA	92505	US	4/20/2022
Leticia McKown	Riverside	CA	92508	US	4/20/2022
Richard Miller	Riverside	CA	92508	US	4/20/2022
Jose Morelos	Riverside	CA	92508	US	4/20/2022
Whitney F	Los Angeles	CA	92508	US	4/20/2022
Trisha Allen	Perris	CA	92570	US	4/20/2022
natalee navarro	Riverside	CA	92508	US	4/20/2022
Enedina Ponce-Perez	Riverside	CA	92508	US	4/20/2022
Weitao Chen	Riverside	CA	92508	US	4/20/2022
Megan Nguyen	Riverside	CA	92508	US	4/20/2022
Ghassan Tarzi	riverside	CA	92508	US	4/20/2022
Ahmed Haddad	Riverside	CA	92508	US	4/20/2022
Cesar Belmonte	Riverside	CA	92508	US	4/20/2022
Natalie Estillore	Riverside	CA	92503	US	4/20/2022
Bradley Copeland				Portugal	4/20/2022
Pete Brasee	Riverside	CA	92503	US	4/20/2022
Julie Cendejas	Perris	CA	92571	US	4/20/2022
Martin Mjelde	Riverside	CA	92508	US	4/20/2022
Lisa Tyson	Riverside	CA	92508	US	4/20/2022
Andrea Pierron	Riverside	CA	92506	US	4/20/2022
Shawna Hamon	Perris	CA	92570	US	4/20/2022
Lindsay Romo	Perris	CA	92571	US	4/20/2022
Elena Mjelde	Riverside	CA	92508	US	4/20/2022
Ying Shen	Riverside	CA	92508	US	4/20/2022
Patricia Farias	Riverside	CA	92503	US	4/20/2022
Mlml Aguilar	Moreno Valley	CA	92557	US	4/20/2022
Stephanie Scott	Riverside	CA	92504	US	4/20/2022
Carla Robledo	Riverside	CA	92509	US	4/20/2022
Genesis Ansbro	Riverside	CA	92503	US	4/20/2022

Richard Baldwin	Redlands	CA	92373	US	4/20/2022
Holly Reeves	Riverside	CA	92506	US	4/21/2022
sharon loonsfoot	Riverside	CA	92508	US	4/21/2022
Susan Knowlton	Riverside	CA	92506	US	4/21/2022
Sara Kwon	Riverside	CA	92508	US	4/21/2022
Kendall Degroat	Inwood		25428	US	4/21/2022
Sath Datla	Riverside	CA	92508	US	4/21/2022
Rosie Santos	Los Angeles	CA	90022	US	4/22/2022
Amerina Baca	Albuquerque		87114	US	4/22/2022
Linda Munday	Atlanta	GA	30319	US	4/22/2022
Isadora Belmonte	Riverside	CA	92509	US	4/22/2022
Kaz Hoenack	Saint Paul		55118	US	4/23/2022
Ingrid Riley	Riverside	CA	92508	US	4/23/2022
Notestine Ryan				US	4/23/2022
Sreejit Menon	Edison		8820	US	4/23/2022
Rose Gerhartz	Riverside	CA	92504	US	4/23/2022
Brandi Marsh	Corona	CA	92880	US	4/23/2022
Taylor Kane	Riverside	CA	92508	US	4/23/2022
Sara Sara A Martinez	Riverside	CA	92508	US	4/23/2022
Tracy Fitzsimmons	Riverside	CA	92508	US	4/23/2022
Michelene Harris	Riverside	CA	92508	US	4/24/2022
Precious Leading Cloud	Buffalo		57720	US	4/24/2022
Helen Stowers	Riverside	CA	92508	US	4/24/2022
Rob Spongberg	Irvine	CA	92618	US	4/24/2022
Podge Lyne	Sarasota	FL	34236	US	4/24/2022
Manoela Cavallo	Jupiter	FL	33418	US	4/24/2022
Allison Escobedo	Los Angeles	CA	90025	US	4/24/2022
Linda Oliva	Riverside	CA	92506	US	4/24/2022
Jennifer Macias	Riverside	CA	92508	US	4/24/2022
Justin Min	Victorville	CA	92392	US	4/24/2022
Jeremy Watts	Riverside	CA	92507	US	4/24/2022
Leah Moore	Kirkland	WA	98034	US	4/24/2022
Rebecca Marsh	Corona	CA	92882	US	4/24/2022
Gary Orme	Riverside	CA	92506	US	4/24/2022
Benjamin Morales	Perris	CA	92571	US	4/24/2022
Delicia shattuck	Riverside	CA	92508	US	4/24/2022
David Cummins	Riverside	CA	92508	US	4/24/2022
Mayra Nava	Chico		95928	US	4/25/2022
Joey Gill	Fontana	CA	92336	US	4/25/2022
Daniel Weatherford	Riverside	CA	92509	US	4/25/2022
Daniel Comstock	Homeland	CA	92548	US	4/25/2022
Ernest Avila	Ontario	CA	91761	US	4/25/2022
david doubravsky	Riverside	CA	92508	US	4/25/2022
Kevin Carney	Riverside	CA	92508	US	4/25/2022
Nancy Ward	Corona	CA	92881	US	4/25/2022
Philip Espeleta	Riverside	CA	92508	US	4/25/2022
Jamie Pulido	Riverside	CA	92508	US	4/25/2022

alyssa johnson	Middletown		19709	US	4/25/2022
Judy Medcraft	Riverside	CA	92508	US	4/25/2022
Sonia Henriquez	Riverside	CA	92508	US	4/25/2022
Stacey Guzman	Lake Elsinore	CA	92530	US	4/25/2022
Anne Smith	Moreno Valley	CA	92518	US	4/25/2022
andrew verzi	Blandon		19510	US	4/25/2022
Jolene Saldivar	Riverside	CA	92503	US	4/25/2022
Beverly Paulson	Riverside	CA	92507	US	4/26/2022
Cathy Przeklasa	Anaheim	CA	92807	US	4/26/2022
ximena zepeda	San Bernardino	CA	92404	US	4/26/2022
GISELLE Gastelum	Moreno Valley	CA	92553	US	4/26/2022
Mariam Youssef	Rialto	CA	92376	US	4/26/2022
Luis Garcia	Rialto	CA	92376	US	4/26/2022
Edward Dorsey	Moreno Valley	CA	92553	US	4/26/2022
Sharein Soliman	Riverside	CA	92505	US	4/26/2022
Anza Akram	Mira Loma	CA	91752	US	4/26/2022
Lima Dezznuts	Clarksville		37040	US	4/26/2022
Cristin Mahaffey	Riverside	CA	92506	US	4/26/2022
Zaria Smith	Ontario	CA	91761	US	4/26/2022
Sabrina Munguia	Perris	CA	92570	US	4/26/2022
Cindy Hernandez	Bellflower	CA	90706	US	4/26/2022
Mishka Bautista	Chicago		60734	US	4/26/2022
Sandra Murillo	Signal Hill	CA	90755	US	4/26/2022
Estefany Graczyk	Corona		92880	Poland	4/26/2022
Stephanie Saul	Fairchild		54741	US	4/26/2022
Nate Horton	Riverside	CA	92506	US	4/26/2022
Humberto Delgadillo	Yorba Linda	CA	92886	US	4/26/2022
Gina Zhuo	Riverside	CA	92509	US	4/26/2022
Aaron Gray	Riverside	CA	92508	US	4/26/2022
Angelica Montejano	Fontana	CA	92507	US	4/26/2022
Adi Rodriguez	Hollywood		33029	US	4/27/2022
Vanessa Triggs	Riverside	CA	92508	US	4/27/2022
Nageen Zarinehbaf	Riverside	CA	92508	US	4/27/2022
Sima Raoufian	Riverside	CA	92508	US	4/27/2022
Omid Asadi	Riverside	CA	92508	US	4/27/2022
Leah Jolin	Fond Du Lac		54935	US	4/27/2022
Jesse Ruiz	Riverside	CA	92508	US	4/27/2022
Gabriel Ramos	Riverside	CA	92508	US	4/27/2022
Katherine Rivera	Perris	CA	92571	US	4/27/2022
Adam Copestick	Long Valley		7853	US	4/27/2022
Lisandra Galeana	Riverside	CA	92508	US	4/27/2022
Fabian Romero	Riverside	CA	92504	US	4/27/2022
Ashley Streit	Warren		16365	US	4/27/2022
Michael Galeana	Beaumont	CA	92223	US	4/27/2022
Raymond Galeana	Moreno Valley	CA	92553	US	4/27/2022
Danielle Bustos	Riverside	CA	92508	US	4/27/2022
Sabina Ghimire	Riverside	CA	92508	US	4/27/2022

Lisa Norris	Riverside	CA	92508	US	4/27/2022
Anaya Ghimire	Riverside	CA	92508	US	4/27/2022
Michael Adrian Galeana Jr	Riverside	CA	92508	US	4/27/2022
Shauna Shaw	Riverside	CA	92503	US	4/27/2022
Sita Kc	Riverside	CA	92508	US	4/27/2022
Bharat Khadka	Riverside	CA	92508	US	4/27/2022
Victoria G Cortez	Riverside	CA	92509	US	4/27/2022
Cynthia Juarez	Riverside	CA	92508	US	4/27/2022
ashim poudyal	Glen Allen	VA	23060	US	4/27/2022
Nannette Plascencia	Riverside	CA	92509	US	4/27/2022
Valerie Olson	Riverside	CA	92508	US	4/27/2022
Susana Gutierrez	Perris	CA	92570	US	4/27/2022
Greg Alvarez	Perris	CA	92570	US	4/27/2022
Edgar Deleon	Perris	CA	92570	US	4/27/2022
Jeanette Mendez	Riverside	CA	92504	US	4/27/2022
Raymund Deslate	Riverside	CA	92508	US	4/27/2022
Anasi Ghimire	Fontana	CA	92337	US	4/27/2022
Joncee Romano	Corona	CA	92880	US	4/27/2022
Kaelah Wilson	San Diego	CA	92110	US	4/27/2022
selena wilson	Riverside	CA	92503	US	4/27/2022
Logan Blanco	Moreno Valley	CA	92555	US	4/27/2022
Wanting Zhao	Riverside	CA	92508	US	4/27/2022
clayton kleckner	Moreno Valley	CA	92555	US	4/27/2022
Brenda Mabry	Waxahachie		75167	US	4/27/2022
Jacquelyn Deslate	Riverside	CA	92508	US	4/27/2022
Sunshine Lopez	Oakland	CA	95353	US	4/27/2022
Zoi Tellez	Riverside	CA	92508	US	4/27/2022
jessie parks	Riverside	CA	92506	US	4/27/2022
Karen Robinson	Riverside	CA	92504	US	4/28/2022
Monica Lopez	Riverside	CA	92508	US	4/28/2022
Anna Laidler	East Stroudsburg		18301	US	4/28/2022
Sara Lopez	Riverside	CA	92506	US	4/28/2022
Megan Ramelot	Duncan	SC	29334	US	4/28/2022
Brad Ramelot	Riverside	CA	92504	US	4/28/2022
John Lopez	Riverside	CA	92508	US	4/28/2022
Steve Goodson	Corona	CA	92880	US	4/28/2022
Kyle Ramelot	Riverside	CA	92504	US	4/28/2022
Gisell Lizarraga	Riverside	CA	92508	US	4/28/2022
Araceli Lizarraga	Riverside	CA	92509	US	4/28/2022
Esmeralda Lizarraga	Riverside	CA	92508	US	4/28/2022
Raul Sánchez	Moreno Valley	CA	92553	US	4/28/2022
Bruce Hammond	Riverside	CA	92508	US	4/28/2022
Yesenia Lizarraga	Riverside	CA	92508	US	4/28/2022
Pedro Garcia	Sun City	CA	92586	US	4/28/2022
June Tueros-Maciel	Riverside	CA	92508	US	4/28/2022
Yadira Lizarraga	Los Angeles	CA	90022	US	4/28/2022
Allison Salgado	Riverside	CA	92507	US	4/28/2022

Stacey Lozano	Moreno Valley	CA	92557	US	4/28/2022
Dwight Sabularse	Fontana	CA	92336	US	4/28/2022
Janel Lovato	Sacramento	CA	95841	US	4/28/2022
Octaviano Zamora	Riverside	CA	92508	US	4/28/2022
Aesha Cruz	Sacramento	CA	95816	US	4/28/2022
Octaviano Zamora	Riverside	CA	92508	US	4/28/2022
gregory garnier	Riverside	CA	92506	US	4/28/2022
Carolyn Rasmussen	Riverside	CA	92508	US	4/28/2022
carly cabral	Oakland	CA	94606	US	4/28/2022
najayra valdovinos	Riverside		92506	US	4/28/2022
Lucinda Guillen	Riverside	CA	92504	US	4/28/2022
Rudy Villegas	Carmichael	CA	95608	US	4/28/2022
Felicia Valencia	Corona	CA	92880	US	4/28/2022
Brittany Feeguson	Chino	CA	91710	US	4/28/2022
Jeanette Sharpe	Riverside	CA	92508	US	4/28/2022
Mary Davis	Riverside	CA	92503	US	4/28/2022
Novah Sierra	South Gate	CA	90280	US	4/28/2022
Stephanie Jimenez	Riverside	CA	92508	US	4/28/2022
Lori Elliott	Riverside	CA	92508	US	4/28/2022
Jeremy Bishop	Riverside	CA	92508	US	4/28/2022
Amy Boring	Riverside	CA	92508	US	4/28/2022
Sarah Forrest	Riverside	CA	92508	US	4/28/2022
Brandon Bryan	Gretna		70056	US	4/28/2022
Alex Ramirez	Riverside	CA	92509	US	4/28/2022
Janaye Rue	Kingman	AZ	86401	US	4/28/2022
Lynn LaBelle	Mammoth Lakes	CA	93546	US	4/28/2022
Jason Edwards	San Marcos	CA	92078	US	4/28/2022
Charles Brown	Hagerstown		21742	US	4/28/2022
Jorge Rosario	San Juan		927	US	4/28/2022
Melanie Davis	Riverside	CA	92503	US	4/28/2022
Carly Gavant	Hoboken		7030	US	4/28/2022
Hugo Cabrera	Corona	CA	92882	US	4/28/2022
Alma Brigandi	Corona	CA	92880	US	4/28/2022
Tracey Starling	Riverside	CA	92506	US	4/28/2022
Man Park	Riverside	CA	92508	US	4/28/2022
Felix Valencia	Riverside	CA	92509	US	4/28/2022
Kevin May	San Luis Obispo	CA	93405	US	4/28/2022
George Rivera	Riverside	CA	92508	US	4/28/2022
Brittney Barnum	Riverside	CA	92503	US	4/28/2022
Jeff Baber	Kansas City		64157	US	4/28/2022
Jace Flores	New York		11373	US	4/28/2022
Sandra Jorge	Riverside	CA	92504	US	4/28/2022
Christopher Jorge	Riverside	CA	92504	US	4/28/2022
Andrea Alvarez	Fontana	CA	92337	US	4/28/2022
Jacquelyn Blau	Riverside	CA	92508	US	4/28/2022
Ashley Trumbull	Riverside	CA	92503	US	4/28/2022
Curt Harris	Riverside	CA	92505	US	4/28/2022

Marcello Souza	Riverside	CA	92509	US	4/28/2022
Jason Peterman	Riverside	CA	92508	US	4/28/2022
Matthew Anderson	Redlands	CA	92374	US	4/28/2022
Blake Bachman	Riverside	CA	92509	US	4/28/2022
Huda Davis	Riverside	CA	92508	US	4/28/2022
Blaine Faria	Riverside	CA	92508	US	4/28/2022
Doug Jean	Corona	CA	92882	US	4/28/2022
Tamra Goris	Costa Mesa	CA	92626	US	4/28/2022
Kevin Conklin	Riverside		92504	US	4/28/2022
Monique Aguirre	Riverside	CA	92508	US	4/28/2022
Destinie Aguirre	Riverside	CA	92508	US	4/28/2022
jayne sly	Epsom		3234	US	4/28/2022
Melanie Castro	Riverside	CA	92504	US	4/29/2022
raul hernandez	Redlands	CA	92373	US	4/29/2022
Lisa Gil	Riverside	CA	92508	US	4/29/2022
enrique soto	Riverside	CA	92508	US	4/29/2022
Sarah Carney	San Luis Obispo	CA	93410	US	4/29/2022
Hannah Sayles	Navarre		44662	US	4/29/2022
Dillon Reynolds	Riverside	CA	92508	US	4/29/2022
Caryssa Orland	Boca Raton		33431	US	4/29/2022
Angelina Lopez	Riverside	CA	92508	US	4/29/2022
Amber Richmond	Riverside	CA	92504	US	4/29/2022
Beatriz Pineda	Riverside	CA	92508	US	4/29/2022
Abi Shuvo	Queens	NY	11432	US	4/29/2022
Michelle Murray	Riverside	CA	92508	US	4/29/2022
Carmen Austin	Fairfield		94533	US	4/29/2022
Nicole Holt				US	4/29/2022
Teanna Ferguson	Orlando		32810	US	4/29/2022
Daniele Singleton	Riverside	CA	92508	US	4/29/2022
Kirk Tueros	Riverside	CA	92508	US	4/29/2022
Sarah Russell	Riverside	CA	92508	US	4/29/2022
donlin rhonda	Rancho Cucamonga	CA	91701	US	4/29/2022
Fuck Ms williams	Bowie		239842	US	4/29/2022
Lisle Brett	Chandler	AZ	85248	US	4/29/2022
Lauren Lambert-aragon	Corona	CA	92882	US	4/29/2022
Lilly Lozano	Riverside	CA	92503	US	4/29/2022
Tina Murdock	Salisbury		28146	US	4/29/2022
Joshua Matthews	Greenfield		1301	US	4/29/2022
Alonzo (Lon) Walcker	Riverside	CA	92506	US	4/29/2022
Khaled Khalil	Riverside	CA	92508	US	4/29/2022
Rachel Bermudez	Ontario	CA	91761	US	4/29/2022
SYLVIA AMARILLAS	Riverside	CA	92508	US	4/29/2022
Kayla Kotsagrelos	Pittsburgh		15227	US	4/29/2022
Sharie Malubay	Riverside	CA	92508	US	4/30/2022
Nicki Ferguson	Port Clinton		43452	US	4/30/2022
Marco Carranza	Mission		78573	US	4/30/2022
Margaret Hanegan-Brown	Fontana	CA	92335	US	4/30/2022

Anthony Brown	Corona	CA	92503	US	4/30/2022
Carson Grant	Flagstaff		86001	US	4/30/2022
RJ SIck	Marietta	GA	30062	US	4/30/2022
Julann Julann	St. Louis		63118	US	4/30/2022
Jack Liskin	Perris	CA	92570	US	4/30/2022
Tiffany Auger	Riverside	CA	92508	US	4/30/2022
Corinne DiNicola	Riverside	CA	92508	US	4/30/2022
Stephanie Scofield	Riverside	CA	92508	US	4/30/2022
Luke Morris	Corona	CA	92880	US	4/30/2022
Corinne Perez	Riverside	CA	92508	US	4/30/2022
Allison Garcia	Perris	CA	92571	US	4/30/2022
Leo Serrano	San Bernardino	CA	92404	US	4/30/2022
Loren Bowles	Riverside	CA	92506	US	4/30/2022
Connie Austin	Perris	CA	92570	US	4/30/2022
Leonardo Blanco	Riverside	CA	92508	US	4/30/2022
Lizzette Vidal	Riverside	CA	92508	US	4/30/2022
Diego Flores	Perris	CA	92571	US	4/30/2022
Nick Cavaioli	Riverside	CA	92503	US	4/30/2022
Stephanie Reimbold	Riverside	CA	92508	US	4/30/2022
Isaiah Garcia	Riverside	CA	92506	US	4/30/2022
Doug Thorne	Riverside	CA	92508	US	4/30/2022
Michael Harrop	Riverside	CA	92503	US	4/30/2022
Valerie Castro	Riverside	CA	92503	US	4/30/2022
Christina Sturgill	Riverside	CA	92507	US	4/30/2022
Alyssa Alvarado	Corona	CA	92880	US	4/30/2022
Jack Smith	Perris	CA	92570	US	4/30/2022
Eunice Ramirez	Perris	CA	92570	US	4/30/2022
Christian Torres	Riverside	CA	92503	US	4/30/2022
Cecilia Torres	Riverside	CA	92506	US	4/30/2022
WINDY HIXSON	Riverside	CA	92508	US	4/30/2022
Paula VanWinkle	Riverside	CA	92504	US	4/30/2022
Kristen Travers	Riverside	CA	92506	US	4/30/2022
Penny Ochoa	Riverside	CA	92508	US	4/30/2022
Jj Estrada	Riverside	CA	92507	US	4/30/2022
Steve Balmer	Riverside	CA	92508	US	4/30/2022
Hunter Calhoun	Riverside	CA	92508	US	4/30/2022
Jalon Patterson	Riverside	CA	92508	US	4/30/2022
Christina Lara	Riverside	CA	92521	US	4/30/2022
Rocio Soria	Riverside	CA	92508	US	4/30/2022
Desiree Friedman	Riverside	CA	92503	US	4/30/2022
Lilian Grijalva	Perris	CA	92570	US	4/30/2022
Ryan MENDEZ	Riverside	CA	92508	US	5/1/2022
selene orozco	Perris	CA	92571	US	5/1/2022
Nicole Codington	Dublin		94568	US	5/1/2022
Nolan Miskell	Santa Fe Springs	CA	90670	US	5/1/2022
Samuel Parra	Anaheim	CA	92804	US	5/1/2022
Gabriela Rivera	Moreno Valley	CA	92555	US	5/1/2022

Joshua Gallardo	Riverside	CA	92507	US	5/1/2022
Lynne Dalton	Riverside	CA	92506	US	5/1/2022
Brittany Garrett	Fontana	CA	92336	US	5/1/2022
Samantha Guerra	Corona	CA	92879	US	5/1/2022
Bridgette Becerra	Riverside	CA	92504	US	5/1/2022
Faten Seryani	Riverside	CA	92518	US	5/1/2022
Ron Bock	Riverside	CA	92503	US	5/1/2022
Kathryn Porter	Moreno Valley	CA	92154	US	5/1/2022
Joseph Alcaraz	Riverside	CA	92501	US	5/1/2022
Lawrence Vaughan	Riverside	CA	92506	US	5/1/2022
Robin Di Muccio	Riverside	CA	92508	US	5/1/2022
Perla Navarro	Riverside	CA	92508	US	5/1/2022
Kai Hargrave	Perris	CA	92570	US	5/1/2022
monika maloof	alessandro heights	CA	92506	US	5/1/2022
Patricia Collins	Riverside	CA	92508	US	5/1/2022
cynthia bratton	riverside	CA	92506	US	5/1/2022
Holly Gunther	Riverside	CA	92508	US	5/1/2022
Matthew Villegas	Riverside	CA	92507	US	5/1/2022
Ryan Lenox	Riverside	CA	92506	US	5/1/2022
Stephanie G	Moreno Valley	CA	92557	US	5/1/2022
Sean Williams	Glendale		91206	US	5/1/2022
Kathryn Irwin	Riverside	CA	92507	US	5/1/2022
Tiffany Donaldson	Queensbury		12804	US	5/1/2022
shawn Spears	Riverside	CA	92509	US	5/1/2022
Roxanna Garcia	Riverside	CA	92509	US	5/1/2022
James Sizer	Riverside	CA	92504	US	5/1/2022
Jaclyn Duque	Riverside	CA	92503	US	5/1/2022
Lisa Everson	Riverside	CA	92508	US	5/1/2022
Amy Derzanovich	Riverside	CA	92504	US	5/1/2022
James Luevano	Moreno Valley	CA	92553	US	5/1/2022
Jonathan Arriaza	Fontana	CA	92336	US	5/1/2022
Kathryn Arriaza	Riverside	CA	92503	US	5/1/2022
Lupe Rios	Riverside	CA	92506	US	5/1/2022
Jessica McDermott	Riverside	CA	92507	US	5/1/2022
Sophie Baldwin	Temecula	CA	92592	US	5/1/2022
Kyle Sweeney	Riverside	CA	92507	US	5/1/2022
Evelyn Fumey	Riverside	CA	92503	US	5/1/2022
Jamaescia Nickerson	Menifee	CA	92584	US	5/1/2022
Amber Coumparoules	Riverside	CA	92508	US	5/1/2022
Rene Trowbridge	Riverside	CA	92508	US	5/1/2022
Jamie Penland	Redlands	CA	92375	US	5/1/2022
Yvette Balliu	Riverside	CA	92506	US	5/1/2022
Brittney Cates	Stow		44224	US	5/1/2022
Wendy Wiley	Riverside	CA	92506	US	5/1/2022
Chase Saltzgiver	Riverside	CA	92503	US	5/1/2022
Robert Johansmeyer	Moreno Valley	CA	92508	US	5/1/2022
Linda W.	Riverside	CA	92508	US	5/1/2022

Joanna Zhao	Riverside	CA	92508	US	5/1/2022
Jason Harvey	Riverside	CA	92503	US	5/1/2022
Katherine Zhao	Riverside	CA	92508	US	5/1/2022
Brooklyn Michael	Fairmont		26554	US	5/1/2022
Raúl Gutiérrez	Riverside	CA	92508	US	5/1/2022
Madelyn Wilson	Riverside	CA	92508	US	5/1/2022
Jennifer Kosloske	Riverside	CA	92508	US	5/1/2022
Janet Pinciurek	Los Angeles	CA	90002	US	5/1/2022
Georganna Hemingway	Riverside	CA	92507	US	5/1/2022
Jill Henderson	Riverside	CA	92508	US	5/1/2022
Toni Sandell	Riverside	CA	92503	US	5/1/2022
Emilia Cline	Corona	CA	92879	US	5/1/2022
Jennifer Pike	Laguna Niguel	CA	92677	US	5/1/2022
Shelby Murphy	Arcadia	CA	91007	US	5/1/2022
Esther Amsterdam	Riverside	CA	92503	US	5/1/2022
Abelam Perez	Riverside	CA	92504	US	5/1/2022
Amanda Edwards	Los Angeles	CA	90064	US	5/1/2022
Erin Munro	Riverside	CA	92507	US	5/1/2022
Fernando Hurtado	Rancho Cucamonga	CA	91730	US	5/1/2022
Denise Brown	Riverside	CA	92508	US	5/1/2022
Rosalind Lewis	Riverside	CA	92508	US	5/1/2022
Jose Martinez	Riverside	CA	92506	US	5/1/2022
Curtis Marantz	Riverside	CA	92506	US	5/1/2022
Peggy Haslam	Moreno Valley	CA	92555	US	5/1/2022
Jazmyn Harvey	Riverside	CA	92503	US	5/2/2022
Carrie Miller	Riverside	CA	92507	US	5/2/2022
Mike Brimhall	Riverside	CA	92508	US	5/2/2022
Miguel Galeana				US	5/2/2022
Rhonda Brimhall	Riverside	CA	92508	US	5/2/2022
Traci Kunka	Riverside	CA	92504	US	5/2/2022
Gwenne Castor	Riverside	CA	92506	US	5/2/2022
Louanne Williamson	Riverside	CA	92506	US	5/2/2022
Pamela Heredia	Riverside	CA	92506	US	5/2/2022
Ann Marchand	Riverside	CA	92506	US	5/2/2022
Peggy Matthews	Riverside	CA	92507	US	5/2/2022
Christina Barhorst	Riverside	CA	92508	US	5/2/2022
Nic Wells	Riverside	CA	92503	US	5/2/2022
Emily Proulx	worcester		1610	US	5/2/2022
andrea hayes	Riverside	CA	92507	US	5/2/2022
Ricky Saitta	Riverside	CA	92508	US	5/2/2022
Patricia Rudd	Riverside	CA	92508	US	5/2/2022
Nancy Haver	Riverside	CA	92506	US	5/2/2022
Isabelle Lousie Gordon	Riverside	CA	92504	US	5/2/2022
Gloria Cuevas	Moreno Valley	CA	92555	US	5/2/2022
Olga Ramirez	Riverside	CA	92505	US	5/2/2022
Shelene wooldridge	Riverside	CA	92504	US	5/2/2022
Amy Luna	Riverside	CA	92503	US	5/2/2022

Humberto Sepulveda	Riverside	CA	92506	US	5/2/2022
Nikol Burks	Temecula	CA	92592	US	5/2/2022
Moira Guillermo	Palm Springs	CA	92264	US	5/2/2022
Melinda Hernandez	Palm Desert	CA	92211	US	5/2/2022
Courtney Sullivan	Fontana	CA	92335	US	5/2/2022
Jessica Espinosa	Fontana	CA	92335	US	5/2/2022
Mira Feliciano	Riverside	CA	92506	US	5/2/2022
TERESA PEDERSEN	Riverside	CA	92506	US	5/2/2022
Kaitlynn Behrenbrinker	Becker		55308	US	5/2/2022
Gayle DiCarlantonio	Riverside	CA	92507	US	5/2/2022
Elizabeth Valdez	Riverside	CA	92508	US	5/2/2022
Christel Gibbins	Riverside	CA	92504	US	5/2/2022
Juan Gomez	Riverside	CA	92509	US	5/2/2022
Amelia Heydari	Riverside	CA	92504	US	5/2/2022
CHAN SHIN	RIVERSIDE	CA	92508	US	5/2/2022
Jessica Boyrazian	Riverside	CA	92506	US	5/2/2022
Marti Sellars	Metairie		70005	US	5/2/2022
Tristan Boyrazian	Riverside	CA	92509	US	5/2/2022
Kayla Guy	Riverside	CA	92503	US	5/2/2022
Marisa Perez				US	5/2/2022
Sara Aschmann	Riverside	CA	92507	US	5/2/2022
Diana Toney	New York		10029	US	5/2/2022
Jasmine Tsui	Riverside	CA	92506	US	5/2/2022
Robert Smoots	Riverside	CA	92508	US	5/2/2022
Jillian Lagasse	Lawrenceville		30043	US	5/2/2022
Shara Hamilton	Phoenix		85083	US	5/2/2022
Rose Cook	Riverside	CA	92507	US	5/2/2022
DENISE GLASS	Riverside	CA	92503	US	5/2/2022
Amanda Horton	Lancaster		40444	US	5/2/2022
Roxana Kochachy	Groton		6340	US	5/2/2022
Harrison Butts	Greensburg		15601	US	5/2/2022
Joy Ballenger	Riverside	CA	92504	US	5/2/2022
Brian Leite	Charlotte	NC	28208	US	5/2/2022
Erin Murphy	HEMET	CA	92545	US	5/2/2022
Jess Knight	Berlin		8009	US	5/2/2022
Heather Reynolds	Riverside	CA	92508	US	5/2/2022
Marissa Nicar	Call		75933	US	5/2/2022
Matthew Dang	Riverside	CA	92504	US	5/3/2022
Etchi Ako	Fontana	CA	92336	US	5/3/2022
Deborah Kester	Riverside	CA	92508	US	5/3/2022
Chris Miller	Moreno Valley	CA	92555	US	5/3/2022
John Hathaway	Fontana	CA	92506	US	5/3/2022
Diane Kwasman	Riverside	CA	91768	US	5/3/2022
Juan Reyes	Moreno Valley	CA	92555	US	5/3/2022
Raleigh koritz	Saint Paul		55114	US	5/3/2022
Kayla Milton	Newberg		97132	US	5/3/2022
Tim Barnard	Riverside	CA	92503	US	5/3/2022

Jaime Cherry	Riverside	CA	92508	US	5/3/2022
Frederick Do	Riverside	CA	92508	US	5/3/2022
Laura Valadez	Redlands	CA	92375	US	5/3/2022
Cal Valladares	Chino	CA	91710	US	5/3/2022
Angela Quick	Riverside	CA	92506	US	5/3/2022
Maria Hathaway	Riverside	CA	92506	US	5/3/2022
Bonnie Croker	Colton	CA	92324	US	5/3/2022
Pat A.	New York		10016	US	5/3/2022
Brittney Brass	Riverside	CA	92780	US	5/3/2022
Yadira Camarena	Riverside	CA	92508	US	5/3/2022
Christopher Rogers	Riverside	CA	92506	US	5/3/2022
Nina Taylor	Riverside	CA	92508	US	5/3/2022
Jessica Van	Washington		20004	US	5/3/2022
Jezelle L	Mira Loma	CA	91752	US	5/3/2022
olivia weaver	Bedford		47421	US	5/3/2022
Monica Johnson	Chicago		60612	US	5/3/2022
Rebecca Costa	Riverside	CA	92503	US	5/3/2022
Darcie Nagel	Riverside	CA	92507	US	5/3/2022
Ryan Gates	Riverside	CA	92504	US	5/3/2022
Johnna Belton	Camden		29020	US	5/3/2022
Rod Sutkowski	Moreno Valley	CA	92553	US	5/3/2022
Yvonne Aponte	Houston		77082	US	5/3/2022
Kelsey Chalfant	Independence		41051	US	5/3/2022
Michael Mudron	Riverside	CA	92508	US	5/3/2022
Jessenia Guerrero	Grand Prairie		75052	US	5/3/2022
Rebekah Roberts	De Soto		66018	US	5/3/2022
Tonya Alves	Norwalk	CA	90650	US	5/3/2022
Andy Contreras	Riverside	CA	92508	US	5/3/2022
Jennifer Victorino	Riverside	CA	92503	US	5/3/2022
Alexa Canchola	Riverside	CA	92507	US	5/3/2022
Tyler Hurt	Somerset	KY	42501	US	5/3/2022
Renata Winder	Baltimore		21213	US	5/3/2022
Nita Brass	Riverside	CA	92509	US	5/3/2022
Christina Estrella	Moreno Valley	CA	92553	US	5/3/2022
Emma Gargano	Wayland		1778	US	5/4/2022
Karina Castrejon	Rogers		72756	US	5/4/2022
Tyler Birdsong	Oklahoma City		73160	US	5/4/2022
Juan Amescua	Sacramento		95823	US	5/4/2022
Logan Webb	Riverside	CA	92506	US	5/4/2022
Kristin Fyfe	Grand Terrace	CA	92313	US	5/4/2022
Judy Garnier	Riverside	CA	92506	US	5/4/2022
brianna houston	Victorville	CA	92395	US	5/4/2022
Mia Brown	Laconia		3246	US	5/4/2022
Tawana Aguilar	Riverside	CA	92508	US	5/4/2022
Kamille Roese	Riverside	CA	92507	US	5/4/2022
Erasto Aguilar	Riverside	CA	92508	US	5/4/2022
Tonia Wilson	Cibolo		78108	US	5/4/2022

Marcos Trejo	Naples		33150	US	5/4/2022
Jeff Rubens	Riverside	CA	92506	US	5/4/2022
Greg Russell	Riverside	CA	92506	US	5/4/2022
Kevin Dawson	Riverside	CA	92506	US	5/4/2022
Scott Simpson	Riverside	CA	92501	US	5/4/2022
Michael Hampton	Riverside	CA	92503	US	5/4/2022
Alexandra Boutros	Riverside	CA	92508	US	5/4/2022
Lindsay Mitchell	San Bernardino	CA	91737	US	5/4/2022
Kyron Eganatovitch	Riverside	CA	92503	US	5/4/2022
Stephanie Owusu	Duncansville		16635	US	5/4/2022
Hailey Teramae	Kapolei		96707	US	5/4/2022
Thomas MacMillan	Riverside	CA	92507	US	5/4/2022
Sue Struters	Riverside	CA	92507	US	5/4/2022
N V	Panorama City	CA	91402	US	5/4/2022
Ken Halama	Riverside	CA	92506	US	5/4/2022
Delilah Allen	Joplin		417	US	5/4/2022
sofia de la cruz	washington			US	5/4/2022
Shuo Zhang	Riverside	CA	92508	US	5/4/2022
Robert Macik	Menifee	CA	92585	US	5/4/2022
David Morgan	Riverside	CA	92507	US	5/4/2022
Frank Patterson	Hemet	CA	92544	US	5/4/2022
Monica Patterson	Riverside	CA	92506	US	5/4/2022
Ellen Schwartz	Riverside	CA	92505	US	5/4/2022
Natalie Gomez	Riverside	CA	92507	US	5/4/2022
Ciara Wilder	Birmingham		35215	US	5/4/2022
Cecilia Bernabe	Las Vegas	NV	92585	US	5/4/2022
Janice Sales	Riverside	CA	92506	US	5/5/2022
Jordyn Neal	Riverside	CA	92506	US	5/5/2022
Adrian Reyna	Riverside	CA	92508	US	5/5/2022
Del Kelly	Riverside	CA	92507	US	5/5/2022
Layla Riojas	Pharr		78577	US	5/5/2022
Heather Davis Russell	Riverside	CA	92506	US	5/5/2022
Alan Baez	Sun City	CA	92585	US	5/5/2022
Fiona Gilman	Erie		16509	US	5/5/2022
Sandra Sharma	Barrington		2806	US	5/5/2022
Sandy Laird	Riverside	CA	92507	US	5/5/2022
Dave Struthers	Riverside	CA	92507	US	5/5/2022
James Wright	Riverside	CA	92508	US	5/5/2022
Alex C	Madison		35758	US	5/5/2022
Sierra Helm	Deland		32720	US	5/5/2022
Dina Yow	Riverside	CA	92503	US	5/5/2022
Denisse Aragon	Santa Ana		92706	US	5/5/2022
larry iest	Riverside	CA	92505	US	5/5/2022
Janet Rodriguez	Riverside	CA	92508	US	5/5/2022
Larry Johnson	Moreno Valley	CA	92553	US	5/5/2022
Michele Cole	Riverside	CA	92508	US	5/5/2022
Dalton Forbes	New Oxford	PA	17250	US	5/5/2022

Rachel Kendal	Gainesville			32611	US	5/5/2022
Marie Rodriguez	Riverside	CA		92508	US	5/5/2022
Lillian Staats	Houston			77081	US	5/5/2022
Samantha Craker	Tulsa			74115	US	5/5/2022
R.D. Jaramillo	Grass Valley	CA		95945	US	5/5/2022
Daniel Szilagyi	Moreno Valley	CA		92557	US	5/5/2022
Hermes ontop	Chula Vista			91913	US	5/6/2022
James Thomson	Moreno Valley	CA		92555	US	5/6/2022
Kathleen Rouleau	Boxford	MA		1921	US	5/6/2022
Kelly Montegna	Riverside	CA		92504	US	5/6/2022
Ashley Galentine	Reynoldsville			15851	US	5/6/2022
Louise Wilson-kennedy	Newcastle Upon Tyne		NE3		US	5/6/2022
Amelia Card	Chase City			23924	US	5/6/2022
John Cervantes	Stafford			22554	US	5/6/2022
James Hannon	Riverside	CA		92506	US	5/6/2022
Julie Hannon	Corona	CA		92882	US	5/6/2022
Cam Andrews	Houston			77063	US	5/6/2022
Marie K.	Ohio			123456	US	5/6/2022
Jessica Mardigian	Norman			73071	US	5/6/2022
JENNIFER GRIFFIN	Riverside	CA		92508	US	5/7/2022
NANCY WALTER	Riverside	CA		92506	US	5/7/2022
Debra Ives	Riverside	CA		92509	US	5/7/2022
Angel Mendoza	Moreno Valley	CA		92553	US	5/7/2022
Kristen Cuff	Riverside	CA		92507	US	5/7/2022
abigail monegan	Lexington			29072	US	5/7/2022
Toni Fletcher	Riverside	CA		92509	US	5/7/2022
Suzanne Hartzell	Riverside	CA		92507	US	5/7/2022
Joan Hagen	Riverside	CA		92506	US	5/7/2022
Joshua Gill	Riverside	CA		92508	US	5/7/2022
Alyssa Soria	Riverside	CA		92508	US	5/7/2022
Nancy Croxton	Norco	CA		92860	US	5/7/2022
Aracely Guerra	Riverside	CA		92508	US	5/7/2022
Aishah O	Atlanta			30309	US	5/7/2022
Joli Ranger	Los Angeles	CA		90060	US	5/7/2022
Daniel Dolecki	Watertown	CT		6795	US	5/7/2022
Randy Hansen	Riverside	CA		92506	US	5/7/2022
Annie Falck Falck	Riverside	CA		92503	US	5/7/2022
Zeruah Reedom	Riverside	CA		92507	US	5/7/2022
Sherry nelson	Riverside	CA		92506	US	5/7/2022
Suzanne Rowland	Riverside	CA		92507	US	5/7/2022
Ruth Meletz	Riverside	CA		92504	US	5/7/2022
Rodrigo Rodriguez	Rancho Cucamonga	CA		91730	US	5/7/2022
Kelsey McFarlin	Victorville	CA		92394	US	5/7/2022
Adrianna Walker	La Jolla	CA		92092	US	5/7/2022
Byul Sak	San Diego	CA		92092	US	5/7/2022
Kateryna Slobodianiuk	Fort Lauderdale			33316	US	5/7/2022
Diana Meletz	Upland	CA		91786	US	5/7/2022

Rick Ebel	Riverside	CA	92508	US	5/7/2022
Maria Rodriguez	Riverside	CA	92509	US	5/7/2022
Dameion Johnson	Memphis		38128	US	5/7/2022
Sabrina Dietzmann	Southlake		76092	US	5/7/2022
Tyler Griffin	Pasadena	CA	91103	US	5/7/2022
Constance Decker	Riverside	CA	92506	US	5/8/2022
Sally Quintana	Riverside	CA	92508	US	5/8/2022
alejandro olivares	Riverside	CA	92509	US	5/8/2022
Bond Lana	North Hollywood		91605	US	5/8/2022
Cornelio Torres	Los Angeles	CA	90017	US	5/8/2022
Lourdes Rodriguez	Rancho Cucamonga	CA	91701	US	5/8/2022
Jeni Williams	Riverside	CA	92509	US	5/8/2022
Sophee Brown	Hot Springs National Park		71901	US	5/8/2022
Mary Patricia A. Letcher	Cape May		8204	US	5/8/2022
Liza Vida	Las Vegas		89148	US	5/8/2022
Julie Morgan	Fort Jones		96032	US	5/8/2022
Macy Dykes	Plant City		33563	US	5/8/2022
Heather Peterman	Riverside	CA	92508	US	5/8/2022
Jacob Brown	Lancaster		40444	US	5/8/2022
Bruno Maccani	Hollywood		33025	US	5/8/2022
nick her				US	5/8/2022
Richard Minitre	Riverside	CA	92508	US	5/9/2022
Janet Thayer	Riverside	CA	92506	US	5/9/2022
Isabella Pasquarello	Philadelphia		19123	US	5/9/2022
Patricia Binford	Riverside	CA	92506	US	5/9/2022
Alessandra Sanders	Belleville		62221	US	5/9/2022
Colleen Vallee	Covington		70433	US	5/9/2022
Bree Lang	Riverside	CA	92509	US	5/9/2022
Kathryn Kelly	Riverside	CA	92506	US	5/9/2022
Gary Gonzales	Riverside	CA	92507	US	5/9/2022
Sarah Christensen	Riverside	CA	92504	US	5/9/2022
Margaret Gate	Corona	CA	92882	US	5/9/2022
Sean Frederiksen	Riverside	CA	92504	US	5/9/2022
Soheil Divani	Riverside	CA	92508	US	5/9/2022
Alex Huber	Fairfield		45014	US	5/9/2022
Mahsa Shakoori	Riverside	CA	92508	US	5/9/2022
Jose Carbajal	Fontana	CA	92335	US	5/9/2022
Michael Parr	Riverside	CA	92503	US	5/9/2022
Marilyn Johnston	Riverside	CA	92508	US	5/9/2022
Mili Yin	Riverside	CA	92504	US	5/9/2022
Diane Wilkinson	Moreno Valley	CA	92553	US	5/10/2022
Angel Porter	Charlotte		28202	US	5/10/2022
Phyllis DeLapp	Riverside	CA	92506	US	5/10/2022
Judith Schumacher-Pronovost	Riverside	CA	92506	US	5/10/2022
Tory Portillo	Fernley		89408	US	5/10/2022
Pete Zobel	Riverside	CA	92508	US	5/10/2022
Leila Allen	Brookline		2445	US	5/10/2022

Donna Cooney	Riverside	CA	92508	US	5/11/2022
Sharon Gate	Riverside	CA	92508	US	5/11/2022
Ana Regalado	Lufkin		75901	US	5/11/2022
zavier martinez	Anchorage		99517	US	5/11/2022
Sergio Salazar	Riverside	CA	92508	US	5/11/2022
Edgar & Kirstie Talavera	Moreno Valley	CA	92555	US	5/11/2022
Paula Narkin	Marcus Hook		19061	US	5/11/2022
Karen Melman	Indianapolis		46227	US	5/11/2022
anijjah Moore	Beachwood		44122	US	5/11/2022
Tom Sokarda	Riversid3e	CA	92506	US	5/11/2022
Alicia Hunter			22701	US	5/11/2022
Ariana Bertel	San Antonio		78240	US	5/11/2022
GDK GDK	O Fallon		62269	US	5/11/2022
Winifred (Penny) Mears	Orlando		32821-7919	US	5/12/2022
Rigby Johnson	Denver		80228	US	5/12/2022
Maliky Burright	Rockford		61101	US	5/12/2022
Charlotte Watson	Atlanta		30317	US	5/12/2022
Michelle Starkey	Roseville		43777	US	5/12/2022
Lily Mejia	Riverside	CA	92508	US	5/12/2022
Kyle Rager	Thurston		43157	US	5/12/2022
Steven Haas	Riverside	CA	92507	US	5/12/2022
Isabelle Pham	Riverside	CA	92504	US	5/12/2022
Genevieve Pham	Riverside	CA	92504	US	5/12/2022
Carlos Gonzalez	Riverside	CA	92521	US	5/12/2022
Stacie Gonzales	Riverside	CA	92506	US	5/12/2022
Crystal Bloom	Riverside	CA	92508	US	5/12/2022
Jay Cee	San Jose		95112	US	5/12/2022
Lauren Amick	New York		10011	US	5/13/2022
Heaven Cruz	Houston		77028	US	5/13/2022
Shannon Hill velasquez	Riverside	CA	92508	US	5/13/2022
Mike Margeson	Riverside	CA	92508	US	5/13/2022
Kailey Paige	Chapel Hill		37034	US	5/13/2022
Katherine Weber	Whittier	CA	90602	US	5/13/2022
jason haynes	osburn		83849	US	5/13/2022
Alfred Lynch	Riverside	CA	92508	US	5/13/2022
Hope Dibble	Brasher Falls		13613	US	5/13/2022
Debra Keskinen	Rancho Santa Margarita	CA	92688	US	5/13/2022
Sarah Crossley	Goshen		46526	US	5/13/2022
Autumn Ritter	Des Moines		50327	US	5/13/2022
Peter Pettis	Riverside	CA	92505	US	5/13/2022
Patti Cotton McNeily	Riverside	CA	92505	US	5/13/2022
Gregory McNeily	Riverside	CA	92505	US	5/13/2022
G. N.	Lebanon		37087	US	5/13/2022
Angiolina chessa	New Bedford		2740	US	5/14/2022
Lizette Kim	Rialto	CA	92376	US	5/14/2022
Catarino Morales González	Jeffersonville		47130	US	5/14/2022
toni arene	Riverside	CA	92509	US	5/14/2022

Alma Luna	Riverside	CA	92508	US	5/14/2022
Prisela Gonzalez	Riverside	CA	92508	US	5/14/2022
Alicia Grove	Riverside	CA	92508	US	5/14/2022
Evan Hernández	Houston		77036	US	5/14/2022
Joel Soto	New York		10029	US	5/14/2022
Autumn Guy	Pottsville		17901	US	5/14/2022
Michelle Allred-Portugal	Riverside	CA	92503	US	5/14/2022
Cinthia Allred-Portugal	Riverside	CA	92503	US	5/14/2022
Rob Salter	Corona	CA	92880	US	5/14/2022
rose chappelle	Broomall		19008	US	5/14/2022
Mark Betty	Riverside	CA	92508	US	5/14/2022
Antonio Flores	Rowlett		75088	US	5/14/2022
Shane Boehmer	Riverside	CA	92508	US	5/14/2022
Eileen Herrick	Riverside	CA	92508	US	5/14/2022
Rosy Javier	riverside	CA	92503	US	5/15/2022
Lexxi Garriel	Orlando	FL	32801	US	5/15/2022
Nathan Heers	Riverside	CA	92508	US	5/15/2022
Benjamin Burgett	Riverside	CA	92506	US	5/15/2022
Darrell Simpson	Shiprock		87416	US	5/15/2022
Maha Belhamra	Davis		95616	US	5/15/2022
Priscille Elusme	Charlotte		28215	US	5/15/2022
Lisa Contreras	San Bernardino	CA	92401	US	5/15/2022
Samantha Alesi	Riverside	CA	92508	US	5/15/2022
Anthony Alesi	Riverside	CA	92508	US	5/15/2022
Giana Devian	Riverside	CA	92503	US	5/15/2022
Mariana Devian	Riverside	CA	92503	US	5/15/2022
Rhonda Loya	Riverside	CA	92508	US	5/15/2022
Charles Daddario	Riverside	CA	92503	US	5/15/2022
Marcine McBride	West Babylon	NY	11704	US	5/15/2022
Suzanne Page	Riverside	CA	92508	US	5/15/2022
Victor Guzman	Riverside	CA	92508	US	5/16/2022
Brittany McKean	Riverside	CA	92506	US	5/16/2022
Ara Ohanyan	Glendale		91207	US	5/16/2022
Stacey Young	Winston-salem		27103	US	5/16/2022
Eric Martinez	Riverside	CA	92508	US	5/16/2022
Estela Rojas-Martinez	Riverside	CA	92508	US	5/16/2022
Alonso Gomez	Baker		89011	US	5/16/2022
Amanda Jacot	Bensalem		19020	US	5/16/2022
CHRISTINA CORTEZ	Riverside	CA	92508	US	5/16/2022
Kassandra Lolong	Riverside	CA	92503	US	5/16/2022
Michelle Ruiz	Fontana	CA	92335	US	5/16/2022
Carter Giannini	Riverside	CA	92503	US	5/16/2022
annalyssa baquiran	Riverside	CA	92509	US	5/16/2022
Julio Gutierrez	Riverside	CA	92509	US	5/16/2022
Lake Olson	Riverside	CA	92508	US	5/16/2022
Katie Chen	Miami		33157	US	5/16/2022
Jeremiah Martinez	Riverside	CA	92503	US	5/16/2022

Eli Rynning	Riverside	CA	92503	US	5/16/2022
Nick S	Chino	CA	91710	US	5/16/2022
Kaitlin Munoz	Riverside	CA	92507	US	5/16/2022
Alondra Arevalos	Moreno Valley	CA	92553	US	5/16/2022
Luke Ackerman	Mission Viejo	CA	92692	US	5/16/2022
Glenn Henry	Rialto	CA	92376	US	5/16/2022
Jenna Velazco	Whittier	CA	90602	US	5/16/2022
Esme Alba	Los Angeles	CA	90002	US	5/16/2022
Isaac Mckoy	Riverside	CA	92503	US	5/16/2022
John Fleury	Ozone Park		11416	US	5/16/2022
Orlando Mota	Riverside	CA	92503	US	5/16/2022
Renuka Ravi	Cary		27519	US	5/16/2022
Andrea Mota	Riverside	CA	92503	US	5/16/2022
Anthony Gonzalez	Menifee	CA	92584	US	5/16/2022
Evelyn Garibay	Moreno Valley	CA	92557	US	5/16/2022
Michel Garcia	Moreno Valley	CA	92555	US	5/16/2022
Litzy Quinones	Rialto	CA	92553	US	5/16/2022
Sylvia Armendarez	Moreno Valley	CA	92553	US	5/16/2022
Daniel Juarez	Moreno Valley	CA	92553	US	5/16/2022
Teresa Maestas	Moreno Valley	CA	92557	US	5/16/2022
Julio Ruiz	Moreno Valley	CA	92557	US	5/16/2022
Mileah Tungate	Moreno Valley	CA	92557	US	5/16/2022
Jaqueline Landa	Moreno Valley	CA	92555	US	5/16/2022
alyssa numgaray	Fontana	CA	92335	US	5/16/2022
Raul Loya	Perris	CA	92570	US	5/16/2022
Victor Jauregui	Moreno Valley	CA	92553	US	5/16/2022
Ruben Parra	Moreno Valley	CA	92553	US	5/16/2022
Kiara Angel	Moreno Valley	CA	92551	US	5/16/2022
Vianey Valenzuela	Fontana	CA	92335	US	5/16/2022
Hector Luna	Nuevo	CA	92567	US	5/16/2022
emily brown	Riverside	CA	92508	US	5/16/2022
Joshua Silva	Moreno Valley	CA	92553	US	5/16/2022
Nathalie Pineda	San Bernardino	CA	92407	US	5/16/2022
Ayleet Paz	Perris	CA	92571	US	5/16/2022
Juana Osorio	Perris	CA	92570	US	5/16/2022
Nenita Lucena	Moreno Valley	CA	92553	US	5/16/2022
Eladia Gonzalez	Menifee	CA	92587	US	5/16/2022
Jacqueline Rodriguez	Riverside	CA	92506	US	5/16/2022
Gissele Lizárraga	Los Angeles	CA	90040	US	5/16/2022
Crystal Blystone	Moreno Valley	CA	92553	US	5/16/2022
Leticia Lopez	Riverside	CA	92503	US	5/16/2022
Grant Black	Riverside	CA	92509	US	5/16/2022
Swami Hercules	Moreno Valley	CA	92553	US	5/16/2022
Samantha Jorge	Riverside	CA	92505	US	5/16/2022
Fernando Gonzalez	Moreno Valley	CA	92553	US	5/16/2022
Patsy Dorado	Riverside	CA	92507	US	5/16/2022
Anthony Gonzalez	Fullerton	CA	92831	US	5/16/2022

Anthony Alonzo	Moreno Valley	CA	92553 US	5/16/2022
Katery Ramirez	Fontana	CA	92335 US	5/16/2022
Mario G	Colton	CA	92324 US	5/16/2022
Yeimi Nunez	Riverside	CA	92508 US	5/16/2022
Lesly Hernandez	Riverside	CA	92503 US	5/16/2022
Vanessa Lucena	Moreno Valley	CA	92553 US	5/16/2022
Anthony Trevizo	Riverside	CA	92509 US	5/16/2022
nenita Lucena	Moreno Valley	CA	92553 US	5/16/2022
Daniela Ramirez	Lake Elsinore	CA	92530 US	5/16/2022
Daisy Martinez	Moreno Valley	CA	92551 US	5/16/2022
Valeria Enciso	Perris	CA	92570 US	5/16/2022
Brian Castrejon	Perris	CA	92571 US	5/16/2022
aidee acosta	Perris	CA	92570 US	5/16/2022
Jessica Garcia	Perris	CA	92571 US	5/17/2022
Ashley Rubio	Moreno Valley	CA	92553 US	5/17/2022
Dominic Lowery-Bowen	Beaumont	CA	92223 US	5/17/2022
Stephanie Jimenez	Riverside	CA	92507 US	5/17/2022
Ruby Arzeta	Banning	CA	92220 US	5/17/2022
BankrollSly Sly	Riverside	CA	92503 US	5/17/2022
Jerry Estrada	Perris	CA	92570 US	5/17/2022
Marko Valenzuela	Moreno Valley	CA	92557 US	5/17/2022
풮퓎퓁퓋풾풶 풟푒풪퓋풶풪풭푒퓈	San Jacinto	CA	92583 US	5/17/2022
D'Janee Brooks	Moreno Valley	CA	92557 US	5/17/2022
Alex Gomez	Perris	CA	92570 US	5/17/2022
Jesica Garcia	Moreno Valley	CA	92553 US	5/17/2022
Yno Perez	Winchester	CA	92596 US	5/17/2022
Monica Calalpa	Perris	CA	92570 US	5/17/2022
Daniel alvarez	Riverside	CA	92506 US	5/17/2022
Victor Reyes	Moreno Valley	CA	92553 US	5/17/2022
Irene Novoa	Perris	CA	92571 US	5/17/2022
Erika Morones	Perris	CA	92571 US	5/17/2022
Francheska Lewis	Riverside	CA	92506 US	5/17/2022
Roberto Rodriguez	Perris	CA	92570 US	5/17/2022
Nicolas Salonen	Los Angeles	CA	90011 US	5/17/2022
Desiree novoa	Perris	CA	92571 US	5/17/2022
Fabiola Castaneda	Moreno Valley	CA	92555 US	5/17/2022
Alejandro Ruvalcaba	Moreno Valley	CA	92555 US	5/17/2022
Susana Gonzalez	Perris	CA	92571 US	5/17/2022
Judith Salgado	Riverside	CA	92501 US	5/17/2022
Petana Siaosi	Moreno Valley	CA	92553 US	5/17/2022
Mari Sanchez	Perris	CA	92571 US	5/17/2022
Denise Angulo	Perris	CA	92571 US	5/17/2022
Jessica Torres	Moreno Valley	CA	92555 US	5/17/2022
Tiffany Elias	Moreno Valley	CA	92553 US	5/17/2022
Nicole Nelson	Riverside	CA	92509 US	5/17/2022
Ava Avo	Riverside	CA	92509 US	5/17/2022
Olivia Lewis	Moreno Valley	CA	92555 US	5/17/2022

Deborah Montana	Riverside	CA	92507	US	5/17/2022
Brenda Garcia	Riverside	CA	92503	US	5/17/2022
Luis Ramos	Fontana	CA	92335	US	5/17/2022
Ivan Zaldivar	Riverside	CA	92501	US	5/17/2022
Brianna Gutierrez	Moreno Valley	CA	92555	US	5/17/2022
Vanessa sanchez	Riverside	CA	92503	US	5/17/2022
Isela Gomez	Moreno Valley	CA	92555	US	5/17/2022
Alejandro Medina	Moreno Valley	CA	92553	US	5/17/2022
Nathalie Peñaloza	Perris	CA	92571	US	5/17/2022
Sandra Reyna	Riverside	CA	92508	US	5/17/2022
Eric Camargo	Perris	CA	92570	US	5/17/2022
Eugene Alvarez	Moreno Valley	CA	92553	US	5/17/2022
Michelle Rincon	Moreno Valley	CA	92553	US	5/17/2022
Tatiana Morgan	Moreno Valley	CA	92553	US	5/17/2022
Natasha Ogeare	Moreno Valley	CA	92555	US	5/17/2022
Omar Vargas	Riverside	CA	92506	US	5/17/2022
Maria Luvian	Perris	CA	92571	US	5/17/2022
Enriqueta Cabrera	Moreno Valley	CA	92553	US	5/17/2022
Stacy Ramirez	Riverside	CA	92506	US	5/17/2022
beto flores	Perris	CA	92571	US	5/17/2022
Angie Monreal	San Bernardino	CA	92407	US	5/17/2022
Stephanie Vargas	Perris	CA	92570	US	5/17/2022
Sarah Elms	Perris	CA	92570	US	5/17/2022
Tammy Almazan	Moreno Valley	CA	92553	US	5/17/2022
Agueda Flores	Ontario	CA	91762	US	5/17/2022
Ioanna Varsamas	Moreno Valley	CA	92551	US	5/17/2022
Ally Zun	Rialto	CA	92376	US	5/17/2022
Mayra Sigalaandrade	Moreno Valley	CA	92553	US	5/17/2022
Winster Gornowsky	Pittsburgh		15212	US	5/17/2022
Gerri Vaughn	Corona	CA	92882	US	5/17/2022
Manny DeBaca	Riverside	CA	92506	US	5/17/2022
Julia Estrada	Perris	CA	92571	US	5/17/2022
David Ochaoa	Moreno Valley	CA	92553	US	5/17/2022
Leslie Onate	Moreno Valley	CA	92553	US	5/17/2022
Jennifer Ruiz	Riverside	CA	92505	US	5/17/2022
Teresa Chavez	Moreno Valley	CA	92555	US	5/17/2022
Jennifer Montenegro	Cathedral City	CA	92234	US	5/17/2022
Alma Arreola	Moreno Valley	CA	92557	US	5/17/2022
Luis Rodriguez	Anaheim	CA	92807	US	5/17/2022
Tenaya Kauffman	Riverside	CA	90011	US	5/17/2022
Kaelan Barrios	Riverside	CA	92508	US	5/17/2022
Bianca Wallace	Pittsfield		4967	US	5/17/2022
Alexandra Martinez	Rancho Cucamonga	CA	91737	US	5/17/2022
Jonathan Mota	Perris	CA	92570	US	5/17/2022
Mario Ramirez	Perris	CA	92571	US	5/17/2022
Nelson Partida	Ontario	CA	91762	US	5/17/2022
Claudia Mejia	Moreno Valley	CA	92557	US	5/17/2022

Amber Ulhaq	Riverside	CA	92508	US	5/17/2022
ana valle	Moreno Valley	CA	92555	US	5/17/2022
Flor Morales	Perris	CA	92570	US	5/17/2022
Sunshine Lopez	Moreno Valley	CA	92555	US	5/17/2022
Luz Ascencio	Moreno Valley	CA	92553	US	5/17/2022
Kimberly Chavez	Moreno Valley	CA	92553	US	5/17/2022
Juanita Ascencio	Moreno Valley	CA	92553	US	5/17/2022
Essam Ulhaq	Riverside	CA	92508	US	5/17/2022
Isabel Castillo	Moreno Valley	CA	92553	US	5/17/2022
Sharla Flores	Moreno Valley	CA	92555	US	5/17/2022
Stephanie Piedrasanta	Moreno Valley	CA	92553	US	5/17/2022
Guillermo Mascote	Hesperia	CA	92345	US	5/17/2022
Jason Larios	Riverside	CA	92507	US	5/17/2022
Edward Huerta	Ontario	CA	91762	US	5/17/2022
Renee Smith	Moreno Valley	CA	92553	US	5/17/2022
Amber Sierra	Corona	CA	92880	US	5/17/2022
Alfonso G Romano	Riverside	CA	92508	US	5/17/2022
Kevin Vejar	Riverside	CA	92509	US	5/17/2022
Patricia Felix	Moreno Valley	CA	92553	US	5/17/2022
davenee mcfadden	Perris	CA	92570	US	5/17/2022
Sergio Arteaga	Moreno Valley	CA	92553	US	5/17/2022
Jenna Bozarth	Riverside	CA	92507	US	5/17/2022
Kaliyah Hardwell	Hayward	CA	94544	US	5/17/2022
Esdras Flores	Moreno Valley	CA	92551	US	5/17/2022
Jessica Lopez	Hemet	CA	92544	US	5/17/2022
Georgina Chapa Flores	Riverside	CA	92509	US	5/17/2022
Janet Olloqui	Los Angeles	CA	90037	US	5/17/2022
Kathleen Robinson	Los Angeles	CA	90036	US	5/17/2022
Erica Medina	Riverside	CA	92509	US	5/17/2022
Katy Beebe				US	5/17/2022
Eduardo Lopez	San Jacinto	CA	92583	US	5/17/2022
Alma Herrera	Riverside	CA	92509	US	5/17/2022
Lynda Dhouti	Moreno Valley	CA	92553	US	5/17/2022
Juan Carrillo-Dominguez	Moreno Valley	CA	92551	US	5/17/2022
Jason Moss	Moreno Valley	CA	92553	US	5/17/2022
Victor Barajas	Moreno Valley	CA	92553	US	5/17/2022
Nidia Santiago	Moreno Valley	CA	92555	US	5/17/2022
Nic Franco	Riverside	CA	92508	US	5/17/2022
Dontae Mercadel	Moreno Valley	CA	92553	US	5/17/2022
Isabelle Hernandez	Moreno Valley	CA	92555	US	5/17/2022
Rebecca Gonzalez	Moreno Valley	CA	92555	US	5/17/2022
Adrian De Santiago	Riverside	CA	92509	US	5/17/2022
Nadja Hernandez	Moreno Valley	CA	92555	US	5/17/2022
Ana Chavez	Riverside	CA	92508	US	5/17/2022
Hector Rodriguez	Moreno Valley	CA	92553	US	5/17/2022
Chelsea Mendoza	Moreno Valley	CA	92551	US	5/17/2022
David Linares	Riverside	CA	92504	US	5/17/2022

Lizbeth O	Moreno Valley	CA	92557	US	5/17/2022
Adriana Garcia	Moreno Valley	CA	92553	US	5/17/2022
Gilbert Pena	Moreno Valley	CA	92553	US	5/17/2022
Mary Reyes	Perris	CA	92571	US	5/17/2022
Janice Vasquez	Moreno Valley	CA	92553	US	5/17/2022
Ernesto Lara	Moreno Valley	CA	92553	US	5/17/2022
Magdalena lopez	Moreno Valley	CA	92555	US	5/17/2022
Eddy Cigarroa	Moreno Valley	CA	92553	US	5/17/2022
Leo Lopez	Moreno valley	CA	92557	US	5/17/2022
Daniel Deckard	Riverside	CA	92503	US	5/17/2022
Elias Valencia	Riverside	CA	92505	US	5/17/2022
Lose Suaalii	Los Angeles	CA	90006	US	5/17/2022
Justin Jimenez	Riverside	CA	92503	US	5/17/2022
Michelle Robles	Moreno Valley	CA	92553	US	5/17/2022
Jessica Rye	Riverside	CA	92506	US	5/17/2022
John Guerrero	Moreno Valley	CA	92553	US	5/17/2022
nancy quintana	Moreno Valley	CA	92553	US	5/17/2022
Lorena Reyes	Perris	CA	92571	US	5/17/2022
Yiota Priskos	Moreno Valley	CA	92553	US	5/17/2022
Andrew Gomez	Riverside	CA	92509	US	5/17/2022
Paola Barajas	Moreno Valley	CA	92553	US	5/17/2022
Elizabeth Ruiz	Riverside	CA	92507	US	5/17/2022
Morgyn Thomas	San Bernardino	CA	92407	US	5/17/2022
Kassandra Bahena	Moreno Valley	CA	92553	US	5/17/2022
denise perez	mesa	AZ	85202	US	5/17/2022
Elizabeth Guiza	Riverside	CA	92508	US	5/17/2022
Miguel Godinez	La Puente	CA	92557	US	5/17/2022
Ana Larios	Hemet	CA	92543	US	5/17/2022
Vanessa Espinoza	Homeland	CA	92548	US	5/17/2022
Alexa Cecena	Riverside	CA	92570	US	5/17/2022
Ana Romero	Moreno Valley	CA	92553	US	5/17/2022
James Garcia	Perris	CA	92571	US	5/17/2022
SERGIO FERNANDEZ	Perris	CA	92570	US	5/17/2022
Jacqueline Rocamora	Moreno valley	CA	92557	US	5/17/2022
Adriana Melendrez	Riverside	CA	92507	US	5/17/2022
Susannah Bennett	Richmond		23236	US	5/17/2022
Kathy Rosales	Moreno Valley	CA	92553	US	5/17/2022
Guadalupe Blanco	Perris	CA	92571	US	5/17/2022
Eduardo Ibarra	Riverside	CA	92503	US	5/17/2022
Jackie Lara	Perris	CA	92571	US	5/17/2022
Vincent Ortiz	Moreno Valley	CA	92555	US	5/17/2022
Claudia Rodriguez	Bloomington	CA	92316	US	5/17/2022
Estephanie Villanueva	Riverside	CA	92508	US	5/17/2022
Victoria Myers	Carrollton		75006	US	5/17/2022
Nitzy Hinojosa	Riverside	CA	92504	US	5/17/2022
Leanna Hernandez	Moreno Valley	CA	92553	US	5/17/2022
Moises Lopez	Moreno Valley	CA	92553	US	5/17/2022

Moises Serrano	Riverside	CA	92504	US	5/17/2022
Yahir Ruelas	Riverside	CA	92505	US	5/17/2022
Benjamin Bolanos	Los Angeles	CA	90063	US	5/17/2022
Evelin Sanchez	San Diego	CA	92105	US	5/17/2022
Aaron Meza	Moreno Valley	CA	92553	US	5/17/2022
Molly Cabeza	Moreno Valley	CA	92553	US	5/17/2022
Lorena Alvidrez	Moreno Valley	CA	92555	US	5/17/2022
Alberto covarrubias	Perris	CA	92570	US	5/17/2022
Guadalupe Mejia	PERRIS	CA	92570	US	5/17/2022
Monique Montoya	Palm Springs	CA	92264	US	5/17/2022
Mari Vargas	Moreno Valley	CA	92555	US	5/17/2022
Elsy Q	Moreno Valley	CA	92555	US	5/17/2022
Ricardo Rivera	Moreno Valley	CA	92553	US	5/17/2022
Lysandra Nerey	Moreno Valley	CA	92555	US	5/17/2022
Sheila Lugo	Riverside	CA	92508	US	5/17/2022
Kristopher Rocha	Riverside	CA	92508	US	5/17/2022
William Reninger	Las Vegas	NV	89117	US	5/17/2022
Sandra Garcia	Moreno Valley	CA	92553	US	5/17/2022
Anthony Sandoval	Moreno Valley	CA	92553	US	5/17/2022
Anghy Gonzalez	Hesperia	CA	92345	US	5/17/2022
Miguel Quiroz	Moreno Valley	CA	92555	US	5/17/2022
Luis Buenrostro	Moreno Valley	CA	92553	US	5/17/2022
yesenia velasco	mira loma	CA	91752	US	5/17/2022
Christopher Aguilar	Moreno Valley	CA	92553	US	5/17/2022
Salvador Sanchez	Moreno Valley	CA	92553	US	5/17/2022
Carlosnoe Ramos	Perris	CA	92570	US	5/17/2022
Jasmine O	Perris	CA	92571	US	5/17/2022
Maria Martinez	Hesperia	CA	92345	US	5/17/2022
Ariana Trejo	Hemet	CA	92545	US	5/17/2022
Guadalupe Gastelum	Los Angeles	CA	90060	US	5/17/2022
Rosana Rufus	Riverside	CA	92508	US	5/17/2022
Edgar Gonzalez	Moreno Valley	CA	92553	US	5/17/2022
Stephanie Garcia	Riverside	CA	92508	US	5/17/2022
Davin Tate	Moreno Valley	CA	92557	US	5/17/2022
James Frankson	Moreno Valley	CA	92557	US	5/17/2022
Joel Raya	Hemet	CA	92543	US	5/17/2022
Melanie De Leon	Moreno Valley	CA	92553	US	5/17/2022
Sara Parr	Riverside	CA	92505	US	5/17/2022
Raman Vasikarla	Coppell		75019	US	5/17/2022
Danielle Falcon	Moreno Valley	CA	92553	US	5/17/2022
Hector Camarillo	Moreno Valley	CA	92553	US	5/17/2022
Esmeralda Villegas	Cullman	AL	35058	US	5/17/2022
Audrey Sanchez	Riverside	CA	92501	US	5/17/2022
Angela Gutierrez	Lake Elsinore	CA	92530	US	5/17/2022
MARIA DEL CARMEN BARBA RAYAS	Moreno Valley	CA	92553	US	5/17/2022
Bryanna Gonzalez	Nuevo	CA	92567	US	5/17/2022
Jelena Gutierrez	Perris	CA	92570	US	5/17/2022

Francisco Lopez	Moreno Valley	CA	92553	US	5/17/2022
Brandy Lopez	Riverside	CA	92507	US	5/17/2022
Juan juan Rodriguez	Riverside	CA	92509	US	5/17/2022
Jordan Rafael	Riverside	CA	92509	US	5/17/2022
Marilu Aguilera	Perris	CA	92570	US	5/17/2022
Delilah Garcia	Perris	CA	92570	US	5/17/2022
Siva Sundaram	Spring	TX	77386	US	5/17/2022
Melissa Delgado	Perris	CA	92570	US	5/17/2022
Stephanie Flores	Moreno Valley	CA	92553	US	5/17/2022
Amber Pena	Moreno Valley	CA	92553	US	5/17/2022
Jose Vazquez	San Bernardino	CA	92407	US	5/17/2022
Leah Miranda	Ontario	CA	91762	US	5/17/2022
Carlos Alvarez	Beaumont	CA	92223	US	5/17/2022
Juan Mercado l	Moreno Valley	CA	92555	US	5/17/2022
Celeste Serrato	Riverside	CA	92504	US	5/17/2022
Shannon Adea	Fontana	CA	92551	US	5/17/2022
Leslie Morales	Moreno valley	CA	92553	US	5/17/2022
Brieauna Windholz	Moreno Valley	CA	92553	US	5/17/2022
ailia uriostegui	Bellflower	CA	90707	US	5/17/2022
Anahi Depaz	Corona	CA	92880	US	5/17/2022
Andy Flamenco	Moreno Valley	CA	92557	US	5/17/2022
Alexyss Morales	Moreno valley	CA	92553	US	5/17/2022
Alberto Valdez	Riverside	CA	92509	US	5/17/2022
Mark Jaurequi	Riverside	CA	92507	US	5/17/2022
Adrian Salazar	Moreno Valley	CA	92553	US	5/17/2022
Andrea Ulloa	Perris	CA	92570	US	5/17/2022
Damaris Aguayo	Moreno Valley	CA	92553	US	5/17/2022
Dylan Nieto	Perris	CA	92570	US	5/17/2022
Gabriel Aguayo Gonzales	Los Angeles	CA	90011	US	5/17/2022
Miguel Uribe	Moreno Valley	CA	92551	US	5/17/2022
Tommy lee	Santa Clara		95054	US	5/17/2022
Nathan Aguayo	Ontario	CA	91762	US	5/17/2022
Adrian Garcia	Perris	CA	92570	US	5/17/2022
Trey Ovens	Laguna Beach	CA	92651	US	5/17/2022
sophia guzman	Chino	CA	91710	US	5/17/2022
Maria Melendez	Moreno Valley	CA	92551	US	5/17/2022
Ldy mar	MV	CA	92555	US	5/17/2022
Kenneth Ratcliff	Pomona	CA	91766	US	5/17/2022
Anyela Guzman	Riverside	CA	92508	US	5/17/2022
David Cota	Riverside	CA	92503	US	5/17/2022
Melina Patino	Perris	CA	92571	US	5/17/2022
Lillie Enriquez	Pomona	CA	91767	US	5/17/2022
MayRa Aguirre	Phoenix	AZ	85041	US	5/17/2022
Jose Gutierrez	Moreno Valley	CA	92555	US	5/17/2022
Edwin Alvarez Loza	Perris	CA	92571	US	5/17/2022
Roman Rodriguez	Westminster	CA	92683	US	5/17/2022
Hector Bautista	Riverside	CA	92508	US	5/17/2022

William Jones	Riverside	CA	92509	US	5/17/2022
JENNIFER ROSE	Riverside	CA	92503	US	5/17/2022
Cindy Beltran	Riverside	CA	92508	US	5/17/2022
Jorge Soto	Los Angeles	CA	90014	US	5/17/2022
Karla Echeverria	Moreno Valley	CA	92557	US	5/17/2022
Diego Duenas	Perris	CA	92571	US	5/17/2022
Judith Frias	Riverside	CA	92509	US	5/17/2022
Maria Sanchez	Moreno Valley	CA	92553	US	5/17/2022
Isabel Moncada	Moreno Valley	CA	92555	US	5/17/2022
Valerie De La Cruz	Perris	CA	92570	US	5/17/2022
Alexis Ramirez	Riverside	CA	92509	US	5/17/2022
Vanessa Borjon-Sandoval	Moreno Valley	CA	92553	US	5/17/2022
Anna Avila	Murrieta	CA	92563	US	5/17/2022
Desiree De La Rosa	San Jacinto	CA	92583	US	5/17/2022
Cristina Robles	Riverside	CA	92508	US	5/17/2022
Araceli Avalos	Riverside	CA	92508	US	5/17/2022
Abigail Sanchez	Moreno Valley	CA	92553	US	5/17/2022
Ryan Garcia	MORENO VALLEY	CA	92557	US	5/17/2022
Alayla Santacruz	Perris	CA	92570	US	5/17/2022
Angel Santacruz	Perris	CA	92570	US	5/17/2022
Christie Hernandez	Los Angeles	CA	90017	US	5/17/2022
Karla Meraz	Perris	CA	92570	US	5/17/2022
Ignacio Santacruz	Perris	CA	92570	US	5/17/2022
Jessica Hayes	Riverside	CA	92506	US	5/17/2022
Allan Sierra	Perris	CA	90006	US	5/17/2022
lee Ellefson	San Clemente	CA	92673	US	5/17/2022
Ezequiel Rodriguez	Los Angeles	CA	90060	US	5/17/2022
Andrea Alaniz	Moreno Valley	CA	92553	US	5/17/2022
Ruben Huerta	Sun City	CA	92585	US	5/17/2022
Edgar Lopez	Perris	CA	92571	US	5/17/2022
Vanessa Cartagena	Moreno Valley	CA	92555	US	5/17/2022
Claudia Martinez	Perris	CA	92570	US	5/17/2022
Edgar Gomez	Moreno Valley	CA	92553	US	5/17/2022
Carla Ascencio	Moreno Valley	CA	92553	US	5/17/2022
Mike Montes	Rancho Cucamonga	CA	91739	US	5/17/2022
Athena Williams	Riverside	CA	92503	US	5/17/2022
Maria Martinez	Perris	CA	92570	US	5/17/2022
Amber Guillen	Perris	CA	92571	US	5/17/2022
Crystal Alvarez	Moreno Valley	CA	92553	US	5/17/2022
Veronica Leanos	Moreno Valley	CA	92553	US	5/17/2022
Cynthia Ayala	Riverside	CA	92509	US	5/17/2022
John Razo	Riverside	CA	92503	US	5/17/2022
Beatris Reyes	Perris	CA	92571	US	5/17/2022
Joseph Marquez	Moreno Valley	CA	92555	US	5/17/2022
Gabriel Ruiz	Moreno Valley	CA	92551	US	5/17/2022
Kim Vong	Riverside	CA	92508	US	5/17/2022
Gavin Smith	Nuevo	CA	92567	US	5/17/2022

Mirna Berdugo	Moreno Valley	CA	92551	US	5/17/2022
Ivan Reyes	Perris	CA	92570	US	5/17/2022
Brtab Cruz	Riverside	CA	92503	US	5/17/2022
Miranda dube	Hesperia	CA	92345	US	5/17/2022
Juanjose Madrigal	Ontario	CA	91762	US	5/17/2022
Perla Morales	Ontario	CA	91762	US	5/17/2022
Natalee Munoz	Riverside	CA		US	5/17/2022
Tania Aguilar	La Puente	CA	91744	US	5/17/2022
Daniel Mariscal	Moreno Valley	CA	92551	US	5/17/2022
Guadalupe Lara	Riverside	CA	92503	US	5/17/2022
Juliana Clark	Jamul	CA	91935	US	5/17/2022
Matthew Negrete	Riverside	CA	92507	US	5/17/2022
Miranda Viramontes	Moreno Valley	CA	92557	US	5/17/2022
Antonia Alaniz	Barstow	CA	92311	US	5/17/2022
Rose Torossian	Los Angeles		90068	US	5/17/2022
Jonathan Rodriguez	Perris	CA	92571	US	5/17/2022
Lupita Lopez	Brenham		77833	US	5/17/2022
Jamell Smith	Riverside	CA	92501	US	5/17/2022
Alondra Sanchez	Montebello	CA	90640	US	5/17/2022
Tyler Fries	Los Angeles	CA	90028	US	5/17/2022
Edwin Palomares	Riverside	CA	92503	US	5/17/2022
Joseph Romero	Cardiff-by-the-Sea	CA	92007	US	5/17/2022
Miryam Pacheco	Moreno Valley	CA	92553	US	5/17/2022
Colleen Beatty	Riverside	CA	92506	US	5/17/2022
alexandria mexia	Perris	CA	92570	US	5/17/2022
Alex Serrato	Perris	CA	92882	US	5/17/2022
Catalena Armijo	Moreno Valley	CA	92551	US	5/17/2022
Tania Rivas	San Bernardino	CA	92410	US	5/17/2022
Diana Rafael	Moreno Valley	CA	92553	US	5/17/2022
Elise Eifler	San Francisco	CA	94129	US	5/17/2022
Lesly Fuentes	Los Angeles	CA	90006	US	5/17/2022
angélica reyes	Moreno Valley	CA	92553	US	5/18/2022
Sammi Sylva	New Jersey		10870	US	5/18/2022
Melissa reyes	Moreno Valley	CA	92555	US	5/18/2022
Jessica Gutierrez	Moreno Valley	CA	92553	US	5/18/2022
Nicte Paez	Montebello	CA	90640	US	5/18/2022
Lauryn Mendez	Moreno Valley	CA	92557	US	5/18/2022
Itsuki Motoko	Riverside	CA	92505	US	5/18/2022
Lorena martinez	Hemet	CA	92544	US	5/18/2022
Magdaleno Sanchez	Ontario	CA	91762	US	5/18/2022
Alyssa Alvarado	Riverside	CA	92504	US	5/18/2022
Jack Vallentine	Riverside	CA	92504	US	5/18/2022
Samantha Ramirez	Riverside	CA	92504	US	5/18/2022
Faith Johnson	Oceana		24870	US	5/18/2022
Cynthia Vega	Moreno Valley	CA	92557	US	5/18/2022
Dante Sanchez	Moreno Valley	CA	92555	US	5/18/2022
Oralia Garcia	La Puente	CA	91746	US	5/18/2022

angel herrera	Menifee	CA	92584	US	5/18/2022
Vanessa Alfaro	Perris	CA	92570	US	5/18/2022
elizabeth Bailey	Wildomar	CA	92595	US	5/18/2022
Verenice Rios	San Diego	CA	92122	US	5/18/2022
Angelica Linares	Moreno Valley	CA	92555	US	5/18/2022
Yael Saavedra	Riverside	CA	92503	US	5/18/2022
Greg Renne	Riverside	CA	92508	US	5/18/2022
Janet Lopez	Huntington Beach	CA	92646	US	5/18/2022
Katherine Rios	Perris	CA	92571	US	5/18/2022
Rosa Baiza	Berkeley	CA	94705	US	5/18/2022
Zulema Franquez	Ontario	CA	91762	US	5/18/2022
Yaritza Ayon	Perris	CA	92570	US	5/18/2022
Izac Enriquez	Riverside	CA	92507	US	5/18/2022
Joel Figuero	Ontario	CA	91762	US	5/18/2022
Jose Mireles	Riverside	CA	92503	US	5/18/2022
Tais Perez	Moreno Valley	CA	92557	US	5/18/2022
Tony T	Flower Mound		75028	US	5/18/2022
Jennifer Tovar	Perris	CA	92571	US	5/18/2022
Jessica G	Perris	CA	92571	US	5/18/2022
Susana Campos	Perris	CA	92571	US	5/18/2022
Aron Covarrubias	Perris	CA	92570	US	5/18/2022
Osiris Ru	La Jolla	CA	92093	US	5/18/2022
Leo Cruz	Riverside	CA	92505	US	5/18/2022
Leticia Romero	Perris CA	CA	92570	US	5/18/2022
Veronica Salcedo	Perris	CA	92571	US	5/18/2022
Ayah Seirfi	Riverside	CA	92503	US	5/18/2022
Clint Moore	Decatur		62522	US	5/18/2022
Josephine Garcia	Moreno Valley	CA	92553	US	5/18/2022
Aaron Dill	Riverside	CA	92507	US	5/18/2022
James Nicholson	Riverside	CA	92503	US	5/18/2022
Daniel Vidal	Perris	CA	92570	US	5/18/2022
Anahy Leon	Riverside	CA	92504	US	5/18/2022
GRACE WEAVER	Stockton		95209	US	5/18/2022
Jennifer Rios	San Jacinto	CA	92583	US	5/18/2022
Denisse Rosales	Perris	CA	92571	US	5/18/2022
Rodrigo Calderon	Perris	CA	92571	US	5/18/2022
Gaby Diaz	Moreno Valley	CA	92553	US	5/18/2022
Jordan Ruiz	Perris	CA	92571	US	5/18/2022
Naomi Sampson	Sonora	CA	95370	US	5/18/2022
Angel Garrow	Akron		44321	US	5/18/2022
Hayley Knecht	Riverside	CA	92507	US	5/18/2022
Savanna Corliss	Redlands	CA	92374	US	5/18/2022
Cesar Alvarado	Los Angeles	CA	90043	US	5/18/2022
Bianca Blua	MORENO VALLEY	CA	92555	US	5/18/2022
Arturo J Campos	Ontario	CA	91762	US	5/18/2022
George Hague	Astoria	OR	97103	US	5/18/2022
Anabel Lopez	Perris	CA	92570	US	5/18/2022

jessennya hernandez	Corona	CA	92882	US	5/18/2022
Mary Ann Ruiz	Chino	CA	91710	US	5/18/2022
Josue Ortega	Riverside	CA	92509	US	5/18/2022
Nancy Garcia	Perris	CA	92571	US	5/18/2022
Eric Miller	Riverside	CA	92503	US	5/18/2022
Victoria Glade	Riverside	CA	92503	US	5/18/2022
Johnatan Rodriguez	Moreno Valley	CA	92553	US	5/18/2022
Chris Ledesma	Moreno Valley	CA	92551	US	5/18/2022
Alexia Alvarez	Perris	CA	92571	US	5/18/2022
Denise Delgado	Moreno Valley	CA	92555	US	5/18/2022
Chi Ezeunala	Riverside	CA	92507	US	5/18/2022
Susan Phillips	Claremont	CA	91711	US	5/18/2022
Maryah Nunez	Moreno Valley	CA	92555	US	5/18/2022
Isidro Jr Deslate	Riverside	CA	92508	US	5/18/2022
Jesus Mendez	Los Angeles	CA	90033	US	5/18/2022
Yatzari Diaz	Ontario	CA	91762	US	5/18/2022
Natalie Glade	Ontario	CA	91761	US	5/18/2022
Jaqueline Basilio	Riverside	CA	92508	US	5/18/2022
Marco Bernal	Riverside	CA	92509	US	5/18/2022
Jill Goodfriend	Oakland		94610	US	5/18/2022
Juan H	Riverside	CA	92503	US	5/18/2022
Jose Mesino	Riverside	CA	92509	US	5/18/2022
Emanuel Solis	Chicago	IL	60629	US	5/18/2022
Evelyn Serrano	Pomona	CA	91766	US	5/18/2022
Rosalind Ulloa	Riverside	CA	92503	US	5/18/2022
Natali Gutierrez	Riverside	CA	92505	US	5/18/2022
Yesenia Lopez	Riverside	CA	92509	US	5/18/2022
Natalie Oliden	Riverside	CA		US	5/18/2022
Jennifer Jimenez	Hesperia	CA	92344	US	5/18/2022
Mahogany Scott	Banning	CA	92220	US	5/18/2022
Miles Barey	Hemet	CA	92545	US	5/18/2022
Anna Spencer	Riverside	CA	92506	US	5/18/2022
Toni Hamilton	Detroit		48	US	5/18/2022
Richard Gutierrez	Ontario	CA	91762	US	5/18/2022
Priscilla Pedroza	Perris	CA	92570	US	5/18/2022
Angel Perez	Riverside	CA	92503	US	5/18/2022
viviana haro	san bernardino	CA	92411	US	5/18/2022
Karina Aguirre	Riverside	CA	92509	US	5/18/2022
Anthony Gonzales	Riverside	CA	92503	US	5/18/2022
IZABELA Juan	Perris	CA	92571	US	5/18/2022
Bryan Rodriguez	Perris	CA	92570	US	5/18/2022
Emely Coronado	Perris	CA	92570	US	5/18/2022
Stephanie Guerra	Perris	CA	92570	US	5/18/2022
LILIANA LLAMAS	Corona	CA	92882	US	5/18/2022
Brandon Gonzalez	San Bernardino	CA	92407	US	5/18/2022
Yoshi Escalante	Riverside	CA	92507	US	5/18/2022
Nadine Rivera	Moreno Valley	CA	92553	US	5/18/2022

aleyda aguirre	Santa Ana	CA	92704	US	5/18/2022
Jacqueline Hernandez	Riverside	CA	92503	US	5/18/2022
Carmen Escalante	Ontario	CA	91762	US	5/19/2022
Alexa Dolen	San Bernardino	CA	92407	US	5/19/2022
Adam Arce Jr	Loma Linda	CA	92354	US	5/19/2022
Camaray Davalos	Los Angeles	CA	90033	US	5/19/2022
Korinne Stowell	Corona	CA	92508	US	5/19/2022
Elizabeth Rios	Moreno Valley	CA	92557	US	5/19/2022
Georgia Renne	Riverside	CA	92508	US	5/19/2022
Gerardo Gonzalez	Ontario	CA	91761	US	5/19/2022
Selene Aguiar	Perris	CA	92571	US	5/19/2022
Fabiola Castellanos	Riverside	CA	92509	US	5/19/2022
Katherine Lopez	San Bernardino	CA	92407	US	5/19/2022
Kristina Mangara	Schaumburg	IL	60193	US	5/19/2022
michael sherman	Pomona	CA	91766	US	5/19/2022
Andrew Alcala	Moreno Valley	CA	92553	US	5/19/2022
Clay Muehls	Riverside	CA	92508	US	5/19/2022
Salina Hernandez	Rialto	CA	92376	US	5/19/2022
Alejandra Romero	Perris	CA	92571	US	5/19/2022
Celeste Castillo	Riverside	CA	92507	US	5/19/2022
Roger Bautista	Moreno Valley	CA	92557	US	5/19/2022
Alley Baba	Perris	CA	92571	US	5/19/2022
Imari Washington	San Diego	CA	92110	US	5/19/2022
Corie Campos	Riverside	CA	92509	US	5/19/2022
Mohsen Lesani	Riverside	CA	92508	US	5/19/2022
Jacqueline Ortega	San Bernardino	CA	92407	US	5/19/2022
Genesis Hermosillo	Perris	CA	92571	US	5/19/2022
Michael Rodriguez	Moreno Valley	CA	92557	US	5/19/2022
Kaulin Rioux	Moreno Valley	CA	92555	US	5/19/2022
Frank Garcia	Redlands	CA	92373	US	5/19/2022
Beatrice Michelle Ortiz	Perris	CA	92571	US	5/19/2022
Cinthya Cruz	Moreno Valley	CA	92553	US	5/19/2022
April Harris	Indianapolis		46222	US	5/19/2022
Diego Garcia	Rancho Cordova	CA	95670	US	5/19/2022
Janice Oien	Moreno Valley	CA	92553	US	5/19/2022
Evelin Coto	Los Angeles	CA	90017	US	5/19/2022
Cindy Luque	Hemet	CA	92545	US	5/19/2022
Yaritza Carranza	Perris	CA	92570	US	5/19/2022
Francisca Rodriguez	Perris	CA	92570	US	5/19/2022
Marco Zepeda	Mead valley	CA	92570	US	5/19/2022
Diane Palomares	Perris	CA	92570	US	5/19/2022
Ivan Mendoza	Perris	CA	92570	US	5/19/2022
Jonathan Espinoza	Moreno Valley	CA	92557	US	5/19/2022
Danny Hernandez	Riverside	CA	92509	US	5/19/2022
Alyssa Hamilton	Moreno Valley	CA	92555	US	5/19/2022
Brianna Mosqueda	Perris	CA	92570	US	5/19/2022
Leo Serafin	perris	OR	92570	US	5/19/2022

Doris Mosqueda	Perris	CA	92570	US	5/19/2022
David Mosqueda	Perris	CA	92571	US	5/19/2022
Sean Ramirez	San Bernardino	CA	92404	US	5/19/2022
Jamie Clements	Perris	CA	92571	US	5/19/2022
Jacqueline Leon	San Bernardino	CA	92407	US	5/19/2022
Julissa Martinez	Perris	CA	92570	US	5/19/2022
Leslie Morales	Ontario	CA	91764	US	5/19/2022
Carol Phillips	Riverside	CA	92506	US	5/19/2022
Brenden Barrios	Corona	CA	92880	US	5/19/2022
somaly son	San Bernardino	CA	92407	US	5/19/2022
Sara Ramirez	Fontana	CA	92336	US	5/19/2022
Lauretta Padgett	Sullivan		47882	US	5/20/2022
Eliah Curry	Linton	ND	58552	US	5/20/2022
claudia menocal	Moreno Valley	CA	92557	US	5/20/2022
Jennifer Carhart	Riverside	CA	92508	US	5/20/2022
Stephanie Murillo	Riverside	CA	92551	US	5/20/2022
Mariana Reyes	Perris	CA	92750	US	5/20/2022
Abraham Grimaldo	Perris	CA	92571	US	5/20/2022
Jessica Monroe	Fort Smith		72904	US	5/20/2022
ERIKA DIAZ	Perris	CA	92571	US	5/20/2022
Esmeralda Aldaz	Sacramento	CA	95822	US	5/20/2022
Bexs Sanchez	Riverside	CA	92506	US	5/20/2022
Natree Bare	Eastvale	CA	91752	US	5/20/2022
Christina Fleming	Jacksonville	FL	32211	US	5/20/2022
Gage Ragsdale	Fort Smith		72904	US	5/20/2022
Jessica Terry	Carlsbad	CA	92008	US	5/20/2022
Maya Reyes	Los Angeles	CA	90008	US	5/20/2022
jisel reyes	South Gate	CA	90280	US	5/20/2022
Ruth Chang	Riverside	CA	92505	US	5/20/2022
Hanna Lee	Riverside	CA	92508	US	5/20/2022
Martin Zemanek	Riverside	CA	92508	US	5/20/2022
hunter harlohs	Temple	TX	76502	US	5/20/2022
Latisha Wilt	Peoria		61604	US	5/20/2022
sonia guzman	willowbrook		60527	US	5/20/2022
Joseph Cruz	Riverside	CA	92503	US	5/20/2022
Marvin Kline	London	UT	84015	US	5/21/2022
Haden Uhrig	Middlesboro		40965	US	5/21/2022
Fernando Rivera	Ogden		84401	US	5/21/2022
Woody Wilson	Garland		75043	US	5/21/2022
Christine Statz	Santa Fe		87505	US	5/21/2022
Tiffany Pimentel	Los Angeles		90063	US	5/21/2022
Alice Musumba	Riverside	CA	92508	US	5/21/2022
Anastasia Patterson	Riverside	CA	92508	US	5/21/2022
Lydia Nyaggah	Riverside	CA	92509	US	5/21/2022
S O	East Orange		7018	US	5/21/2022
William Hsu	Seal Beach	CA	90740	US	5/21/2022
joan scott	arcadia		91006	US	5/21/2022

Diana Anderson	Riverside	CA	92518	US	5/21/2022
Arianna Thornton	Riverside	CA	92508	US	5/21/2022
Melanie Cooley	Riverside	CA	92505	US	5/21/2022
Jennifer Duckworth	Irvine	CA	92618	US	5/21/2022
Daniel Ramos	Riverside	CA	92507	US	5/21/2022
Tiffany Cartigiano	Riverside	CA	92508	US	5/21/2022
Anthony Musumba	Riverside	CA	92508	US	5/21/2022
Steve Carter	Riverside	CA	92508	US	5/21/2022
Reyna Abrazaldo	Riverside	CA	92508	US	5/21/2022
Gustavo Borrayo	Riverside	CA	92508	US	5/21/2022
Karina Cody	Riverside	CA	92503	US	5/21/2022
Ashley Whipple	Riverside	CA	92508	US	5/21/2022
Reynold Tanuwidjaja	Riverside	CA	92508	US	5/21/2022
Tiffany Perry	Riverside	CA	92508	US	5/21/2022
Gloria Sedano	Riverside	CA	92508	US	5/21/2022
Rocio Casarez	Corona	CA	92508	US	5/21/2022
Jeffrey Stowell	Riverside	CA	92508	US	5/21/2022
Clara Zenteno	Riverside	CA	92508	US	5/21/2022
Amber Rashidi	Riverside	CA	92508	US	5/21/2022
Frank Nuno	Riverside	CA	92508	US	5/21/2022
Leticia Annas	Riverside	CA	92508	US	5/21/2022
Stephen Smith	Riverside	CA	92506	US	5/21/2022
Julianne Stivers	Orange	CA	92867	US	5/21/2022
Serena Skaggs	Las Vegas		89121	US	5/21/2022
Christine Heinemann	Riverside	CA	92508	US	5/21/2022
Kevin Heinemann	Riverside	CA	92508	US	5/21/2022
rachel CHEUNG	Riverside	CA	92508	US	5/21/2022
Amanda Sherer	Corona	CA	92508	US	5/21/2022
Eunice Kinyari	Corona	CA	92880	US	5/22/2022
Timothy Bratton	Riverside	CA	92508	US	5/22/2022
William Bailey	Riverside	CA	92507	US	5/22/2022
Mike Fernholz	Riverside	CA	92508	US	5/22/2022
Ashley Alcala	Riverside	CA	92508	US	5/22/2022
Jose Alcala	Riverside	CA	92508	US	5/22/2022
Naif Robert	Riverside	CA	92508	US	5/22/2022
Rana Eid	Riverside	CA	92508	US	5/22/2022
Joshua Charette	Riverside	CA	92506	US	5/22/2022
Abby Sindaha	Riverside	CA	92521	US	5/22/2022
Edgar Gil	Riverside	CA	92508	US	5/22/2022
Korinne Stowell	Riverside	CA	92508	US	5/22/2022
Hans Christiansen	Denver		80228	US	5/22/2022
Evan Charles	Riverside	CA	92508	US	5/22/2022
Leeann Stowe	Menifee	CA	92584	US	5/22/2022
Maureen Cummins	Riverside	CA	92508	US	5/22/2022
paddy mwembu	Riverside	CA	92509	US	5/22/2022
Cheryl Gutierrez	Moreno Valley	CA	92557	US	5/22/2022
John Viafora	Riverside	CA	92508	US	5/22/2022

Kaylene Alvarez	Riverside	CA	92504	US	5/22/2022
Gina Neel	Los Angeles	CA	90007	US	5/22/2022
Alyssa De Mint	Riverside	CA	92508	US	5/22/2022
Jennifer Henry	Perris	CA	92508	US	5/22/2022
Jennifer Tritt	Fontana	CA	92336	US	5/22/2022
Diana Ramos	San Bernardino	CA	92410	US	5/22/2022
Vanessa Rogers	Riverside	CA	92508	US	5/22/2022
Julio Hurtado	Riverside	CA	92508	US	5/22/2022
Edgar Diaz	Lake Elsinore	CA	92530	US	5/22/2022
Elizabeth Romero	Menifee	CA	92585	US	5/22/2022
Laura Robinson	Riverside	CA	92508	US	5/22/2022
Lisa Sweet	Riverside	CA	92508	US	5/22/2022
Argel Carrasco	Hialeah		33010	US	5/22/2022
danielle casem	Riverside	CA	92508	US	5/22/2022
Leilani Polder	Riverside	CA	92508	US	5/22/2022
Lisa Biesiada	Perris	CA	92570	US	5/22/2022
Jianmei Wang	Riverside	CA	92508	US	5/22/2022
Lila Dalton	Riverside	CA	92503	US	5/22/2022
Michelle Mckenzie	Riverside	CA	92503	US	5/22/2022
Jocelyn bojorges	Bloomington	CA	92316	US	5/22/2022
susanne haynes	bonaparte	IA	52620	US	5/22/2022
Laurie Steinbarge	Riverside	CA	92508	US	5/23/2022
Jennifer Neihardt	Los Angeles	CA	92508	US	5/23/2022
Lauren Leinz	Riverside	CA	92506	US	5/23/2022
Mike White	Riverside	CA	92504	US	5/23/2022
Skylar Stowell	Riverside	CA	92508	US	5/23/2022
Lynne Roberts	Riverside	CA	92506	US	5/23/2022
Robert Leinz	Riverside	CA	92506	US	5/23/2022
Linda Freeman	Yuba City		95991	US	5/23/2022
vada koepp	Foxworth		39483	US	5/23/2022
Kirstie Rocha	Riverside	CA	92508	US	5/23/2022
Cleo Savala	Jacksonville	FL	32218	US	5/23/2022
Marlon Bright	Bloomington	CA	92316	US	5/23/2022
Crisa Herzog	Los Angeles	CA	90007	US	5/23/2022
Destiny Davis	Oakland		94609	US	5/23/2022
Tiffany Tighe	Riverside	CA	92508	US	5/23/2022
Terri Jackson	Vacaville	CA	95687	US	5/23/2022
Michael Cook	Riverside	CA	92508	US	5/23/2022
Andrew Silva	Riverside	CA	92508	US	5/23/2022
Goldberry Long	Riverside	CA	92506	US	5/23/2022
Nicole Saldana	Riverside	CA	92506	US	5/24/2022
Amy King	San Francisco	CA	94103	US	5/24/2022
Lupe Delgadillo	Riverside	CA	92508	US	5/24/2022
Donny Delgadillo	Riverside	CA	92508	US	5/24/2022
Gregg Levine	Astoria		11102	US	5/24/2022
Matthew Gray	Mississauga		L5G 2R9	US	5/24/2022
Amanda Sepulbeda	Sundown		79372	US	5/24/2022

Abby Madden	Angola		46703	US	5/24/2022
Amna Shahid				US	5/24/2022
Ella Devenny	Denver		80211	US	5/24/2022
janis ripple	Orion		48362	US	5/24/2022
Dev Rose	Brooklyn		11221	US	5/24/2022
Pierce Stoever	San Bernardino	CA	92410	US	5/24/2022
Justin Gov	Los Angeles		90022	US	5/24/2022
Tanner Labrecque	San Bernardino	CA	92410	US	5/24/2022
Barbara Sanagustin	Saint Clair Shores		48082	US	5/25/2022
Cameron Kennedy	Riverside	CA	92375	US	5/25/2022
Eric Keck	Riverside	CA	92508	US	5/25/2022
Maria Rodriguez	Riverside	CA	92509	US	5/25/2022
Greg Garnier				US	5/25/2022
John McKnight	El Cajon	CA	92020	US	5/25/2022
David Kessler	Berkeley	CA	94705	US	5/25/2022
Maddie chang	Hinsdale		60521	US	5/25/2022
Damon Woods	San Diego		92105	US	5/25/2022
Immanuel Davis			85635	US	5/25/2022
Kenneth Renne	Los Angeles	CA	90060	US	5/25/2022
Markaye Larson	Riverside	CA	92506	US	5/26/2022
Evelyn Pacheco	Chico		95928	US	5/26/2022
Madeline Cowen	Larchmont		10538	US	5/26/2022
Michele Muehls	Riverside	CA	92506	US	5/26/2022
Tristan Inglesby	Southampton		18966	US	5/26/2022
Cynthia Thomas	Riverside	CA	92508	US	5/26/2022
Michael Snell	Riverton		84065	US	5/26/2022
Destiny Cabral	Mission Hills		91345	US	5/26/2022
Brandon Childs	Jacksonville		32221	US	5/26/2022
Sophie Hauptman	Denham Springs		70726	US	5/26/2022
Miguel Quezada	Fort Lauderdale		33311	US	5/26/2022
Katelyn Corson	Hillsborough		8844	US	5/26/2022
Alex Ferreira	Riverside	CA	92508	US	5/26/2022
Jorge Zaragoza	Riverside	CA	92508	US	5/26/2022
Amy Roberts	Frankfort		40601-2603	US	5/26/2022
Hannah bennett	Sacramento		95828	US	5/27/2022
broski lopez	Albuquerque		87104	US	5/27/2022
Muriel Gilgen	Miami		33179	US	5/27/2022
Aaron Bushong	Riverside	CA	92508	US	5/27/2022
Erin Giron	Riverside	CA	92503	US	5/27/2022
Kayla Humphrey	Palmdale		93551	US	5/27/2022
Feodor West	Portland		97202	US	5/27/2022
Zoe Riley	Salina		67401	US	5/27/2022
Joshua Curphey	Peterborough		PE7	US	5/27/2022
Cari McCoy	Riverside	CA	92508	US	5/27/2022
Tim Mason	Fountain Inn		29644	US	5/27/2022
Alexander Webb	Riverside	CA	92508	US	5/28/2022
Svetlana Webb	Riverside	CA	92508	US	5/28/2022

Asia Henry	Riverside	CA	92508	US	5/28/2022
Isaiah Matz	Olympia		98501	US	5/28/2022
Genaro Castro	Moreno Valley	CA	90060	US	5/28/2022
Deborah Lynn Hoster	Tucson		85712	US	5/28/2022
Brady Coker	Melbourne		32904	US	5/29/2022
Khavon Grant	Killeen		76543	US	5/29/2022
Michele Reece	New York		10118	US	5/29/2022
Rosa Castro	Moreno Valley	CA	92557	US	5/29/2022
Isela Ceja	Perris	CA	92571	US	5/29/2022
BRANDY TANDECKI	Cottonwood		86326	US	5/29/2022
G Lomeli	Anaheim	CA	92817	US	5/29/2022
Clarisa L	Santa Cruz	CA	95064	US	5/29/2022
Josr Orreaga	Perris	CA	92571	US	5/29/2022
Rhiannon Stone	Conway		72032	US	5/30/2022
Yvette Cisneros	Riverside	CA	92508	US	5/30/2022
Angela Finley	Highland		92346	US	5/30/2022
Madisyn Bradshaw	Vancouver		98681	US	5/30/2022
John Scott	Georgetown		29440	US	5/30/2022
Rigo Estrada	Riverside	CA	92508	US	5/30/2022
Rj olsen	Wahiawa		96786	US	5/31/2022
Sandeep Singh	Sacramento		95811	US	5/31/2022
Latisha Griffin	Ft Mitchell		41017	US	5/31/2022
Roslynne Ravy	Sunbury		17801	US	6/1/2022
Zen Aphh	Bowie		20720	US	6/1/2022
Devyn Henrise	Arlington		76006	US	6/1/2022
Zak Myers	Jacksonville		32073	US	6/1/2022
Donald Hall	Burbank		60459	US	6/1/2022
Maggie D	Boston		2163	US	6/1/2022
Myla Mitchell	Beaverton		97006	US	6/1/2022
Savannah Jacobson	Mchenry		60050	US	6/1/2022
Alexandra Adams	Kokomo	IN	46902	US	6/1/2022
Kari Lafferty	Roseville		95678	US	6/1/2022
Kiana Horton	Phenix City		36867	US	6/1/2022
Renee Hill	Riverside	CA	92503	US	6/1/2022
Jon Howard	Riverside	CA	92508	US	6/1/2022
Lauren Marquez	Riverside	CA	92507	US	6/2/2022
April Rochelle	Taylorsville		84129	US	6/2/2022
Skyler A	Los Angeles	CA	90033	US	6/2/2022
Gil Cas	Riverside	CA	92508	US	6/2/2022
Selina Davy	Riverside	CA	92508	US	6/2/2022
Shannon Castillo	Riverside	CA	92521	US	6/2/2022
Isabelle Hopkins	Quail Valley	CA	92587	US	6/2/2022
Mary Kerr	Anna		62906	US	6/2/2022
Sarah Glenn	Riverside	CA	92503	US	6/2/2022
Lisa Strand	Carbondale		81623	US	6/2/2022
Patricia Reeves	Riverside	CA	92508	US	6/2/2022
Bobby Robinette	Riverside	CA	92508	US	6/2/2022

Jamie Jauregui	Riverside	CA	92503	US	6/2/2022
Christa Jauregui	Riverside	CA	92509	US	6/2/2022
Matalyn Prusinski	Elkhart		46516	US	6/2/2022
Gary Lalim	Noblesville		46062	US	6/3/2022
Jack Katzanek	Riverside	CA	92508	US	6/3/2022
Kainat Khan	Riverside	CA	92508	US	6/3/2022
jen roy	Terryville		6786	US	6/3/2022
Luqman Mohamed	Minneapolis		55436	US	6/3/2022
Miriam Jimenez	Garland		75040	US	6/3/2022
Andrew Englehart	Cincinnati		45202	US	6/3/2022
Joe Mama	kerman		93630	US	6/3/2022
Lakshmi Sewdass	Hollis		11423	US	6/3/2022
Wendy Grider	Jasper		37347	US	6/3/2022
Victoria Santana	Riverside	CA	92503	US	6/3/2022
Gina Robinette	Norco	CA	92860	US	6/3/2022
Andrew Robinette	Riverside	CA	92508	US	6/4/2022
Joe C	New York		10011	US	6/4/2022
Lorraine Wagner	Fleming Island		32003	US	6/4/2022
Brandy Bickle	Riverside	CA	92506	US	6/4/2022
Albert Hernandez	Riverside	CA	92506	US	6/4/2022
Taylor Carroll	San Antonio		78248	US	6/4/2022
Derrill watson	Pryor		74361	US	6/4/2022
david reynold	West Fork		72774	US	6/4/2022
Martin Jimenez	Chicago		60619	US	6/4/2022
Austin Ward	Corvallis	OR	97330	US	6/5/2022
Carlos Lopez	Placentia		92870	US	6/5/2022
larry lahr	Merchantville		8109	US	6/5/2022
Rachael Lykens	Inwood		25428	US	6/5/2022
Derek Pedraza	Gaithersburg		20878	US	6/5/2022
Allena Wayne	Kaufman		75142	US	6/5/2022
Joshua Reyes	Lancaster		17602	US	6/5/2022
Joseph Moncrief	Potts Camp		38659	US	6/5/2022
Delaney Vaughn				US	6/6/2022
Allison Gr				US	6/6/2022
Mike Flangel	Agoura Hills	CA	91301	US	6/6/2022
Quandale Dingle	Louisville		40245	US	6/6/2022
juan lopez	Hayward		94544	US	6/6/2022
Laura Natalie Hendrickson	Falls Church		22046	US	6/6/2022
Kristin Mann	Long Beach	CA	90807	US	6/6/2022
pam clark	Riverside	CA	92508	US	6/6/2022
debbie brown	corydon		42406	US	6/6/2022
sara parra	Riverside	CA	92508	US	6/7/2022
Liliana Domingues	Newark		07105-0581	US	6/7/2022
Elsa Brumbaugh	Cherry Hill		8003	US	6/7/2022
Evan Sirota	Pittsburgh		15226	US	6/7/2022
Mia Keith	Gainesville		30506	US	6/7/2022
Aicha Cisse	Detroit		48214	US	6/7/2022

Lara Shannon	Groesbeck		76642	US	6/7/2022
Daniel Vopat	Riverside	CA	92508	US	6/8/2022
Aracely Vopat	Riverside	CA	92508	US	6/8/2022
Cameron Dillon	Front Royal		22630	US	6/8/2022
Erinn Neal	North Las Vegas		89084	US	6/8/2022
Jeff Smith	Temecula	CA	92591	US	6/8/2022
Aisha Morante	Hilo		96720	US	6/8/2022
Dianne Gohmann	San Jose		95112	US	6/8/2022
Cristina Deathriage	Modesto	CA	95355	US	6/8/2022
L thomas	New York		10027	US	6/8/2022
Sherry McFadden	Jefferson		75657	US	6/8/2022
Amy Arvizu	Riverside	CA	91761	US	6/8/2022
Richard Arvizu	Montclair	CA	91763	US	6/8/2022
Shane Turner	Augusta		67010	US	6/8/2022
Chris Perry	Buckhannon		26201	US	6/8/2022
Sami L	Topsfield		1983	US	6/9/2022
brian mullis	Monroe		28110	US	6/9/2022
Maritza Orozco	Orlando		32837	US	6/9/2022
Marlita Gamble	Wauconda		60084	US	6/9/2022
Dezariah Rose	new sharon		4955	US	6/9/2022
Christian Cook	Peabody		1960	US	6/9/2022
Seth Lintz	Vallejo		94590	US	6/9/2022
Kyungsin Park	Riverside	CA	92504	US	6/10/2022
Dulce Mendoza	Riverside	CA	92505	US	6/10/2022
Dylan Gibson	Peachtree City		30269	US	6/10/2022
Kayla Russ	Gastonia	NC	28056	US	6/10/2022
Debora Edwards	Shelburne Falls		1370	US	6/10/2022
ภาวรีย์ ว่องไววิทย์	กรุงเทพ		10250	Thailand	6/10/2022
Haley Mudron	Riverside	CA	92508	US	6/10/2022
Chyee Wang	Riverside	CA	92508	US	6/10/2022
John Wang	Riverside	CA	92508	US	6/10/2022
Lu Wang	Riverside	CA	92505	US	6/10/2022
Woodrow Sarver	Bement		61813	US	6/11/2022
Denise Stephenson	Riverside	CA	91767	US	6/11/2022
Cathy Mudron	Riverside	CA	92508	US	6/11/2022
Sarah Correa	Herriman		84096	US	6/11/2022
John Zuehlke	Sherman Oaks	CA	91401-5709	US	6/11/2022
Kristen Chandler	Fortuna		95540	US	6/11/2022
Jessica Bennett	New Martinsville		26155	US	6/11/2022
John Doe	Santa Clara		95052	US	6/11/2022
Alex Villa	San Jose	CA	95116	US	6/11/2022
Christine Dolan	Hillsboro		63050	US	6/11/2022
Chester Clark	Horsham		19044	US	6/11/2022
Selma Markovic	Riverside	CA	92508	US	6/11/2022
Kenan Frljuckic	Riverside	CA	92508	US	6/11/2022
Coral Goins	Cleveland		37323	US	6/12/2022
Awp Light	San Jose		95123	US	6/12/2022

Kennedy Shassetz	Rock Springs		82901	US	6/12/2022
Paul Ramos	Athens		33180	US	6/12/2022
Yesenia Ramirez	Los Angeles		90045	US	6/12/2022
Henry Perkins	Denver		80238	US	6/12/2022
Enrique Santiesteban	Chihuahua		31214	Mexico	6/12/2022
aspen middleton	Omaha		68197	US	6/12/2022
Shirley Manus	Aptos		95003	US	6/12/2022
Syeda Anam	West Bloomfield		48322	US	6/12/2022
Cassandra Gonzalez	Bellflower		90706	US	6/12/2022
Zaray Ramos	San Diego		92114	US	6/12/2022
Leonidas Roman	Chesapeake		23323	US	6/12/2022
Kanisha Sizemore	Madison		37115	US	6/12/2022
Imane Jai	Prosper		75078	US	6/12/2022
Kelby Vasquez Perez	New York		10118	US	6/12/2022
Sterling Robbins	Kansas City		64118	US	6/12/2022
Mindy Bonhomme	Kalamazoo		49004	US	6/12/2022
Kenaz Nasser	Washington		20037	US	6/12/2022
Marie Godley				US	6/12/2022
azi Dirin	Redondo Beach		90278	US	6/13/2022
Brandee Carter	Shepherdsville		40165	US	6/13/2022
Nancy Lourenco	Riverside	CA	92503	US	6/13/2022
Halle Hoskins	Bradenton		34208	US	6/13/2022
Ava Hein	Riverside	CA	92508	US	6/13/2022
Clinton Dollarhide	Jacksonville		97530	US	6/13/2022
Rachel Barnes	Columbia		65201	US	6/13/2022
Jessica Schleher	Acworth		30101	US	6/13/2022
Denise Glass	Port Saint Lucie		34953	US	6/13/2022
kadough M				US	6/13/2022
D'Andre Wright	Atlanta		30311	US	6/13/2022
Brandon Mendez	Phoenix		85043	US	6/13/2022
Dontre Royal	Visalia		93291	US	6/13/2022
Samuel Li	Sammamish		98074	US	6/13/2022
Wade Wilson	Euless		76039	US	6/14/2022
tori cole	jefferson city		65109	US	6/14/2022
Stephanie Clarke	Huntsville		35763	US	6/14/2022
Steve Junso	Modesto		95350	US	6/14/2022
Jocelyn Castillo	Mesa		85205	US	6/14/2022
Rosemary González	Moreno Valley		92553	US	6/14/2022
Sophie Skelly	Wilmington		19801	US	6/14/2022
Deborah Setzrr	Lincolnton		28092	US	6/14/2022
John Rello	Chatham		7928	US	6/14/2022
Grayson Glancy	Greenville		45331	US	6/14/2022
Dewayne Henson	Poplar bluff		63901	US	6/14/2022
Teanna Gilliam	Atlanta		30305	US	6/14/2022
john cena	perris		92570	US	6/15/2022
lana marie	los angles		90001	US	6/15/2022
Noa Freiwald	Brooklyn		11220	US	6/15/2022

Kent Ankenman	Omaha		68114	US	6/15/2022
anna trapani	Fairport		14450	US	6/15/2022
Emily Vasquez	Ontario	CA	92324	US	6/15/2022
Sunelly Olivares	Bronx		10453	US	6/15/2022
Mayra Perez	Moreno Valley		92553	US	6/15/2022
Diana Mizer	Riverside	CA	92508	US	6/15/2022
Anabel Stockton	Riverside	CA	92808	US	6/15/2022
Anthony Balderas	Los Angeles		90001	US	6/15/2022
Aurora Sanchez	Riverside	CA	92508	US	6/15/2022
Brooke Jimenez	Riverside	CA	92508	US	6/15/2022
natalie rellick	Mentor		44060	US	6/15/2022
Maguy Guiteau	Brooklyn		11233	US	6/16/2022
Tara Astran	Riverside	CA	92503	US	6/16/2022
Samuel Pierre	Indianapolis		46203	US	6/16/2022
William Krauss	Woonsocket		2895	US	6/16/2022
Chloe Leach	Chicopee		1020	US	6/16/2022
Gisela Joaquin	Marathon		33050	US	6/16/2022
William Hicks	Anacoco		71403	US	6/16/2022
Harvey Flotte	Austin		78758	US	6/16/2022
Patricia Offer	Sacramento		95826	US	6/16/2022
Thomas Shannon	Barstow		92311	US	6/16/2022
cassie johnson	Washington		20002	US	6/17/2022
Steve N	Plymouth		48170	US	6/17/2022
M P	London		80210	US	6/17/2022
Kathryne Richardson	Grand Rapids		49506	US	6/17/2022
Rebecca Mitchell	Spokane		99202	US	6/17/2022
Isaiah Stevens	Key West		33040	US	6/17/2022
Mariah Lunn	Howmey		53881	US	6/17/2022
Sandra Acevedo	El Paso		79936	US	6/17/2022
Lin Zhao	Riverside	CA	92507	US	6/17/2022
Grace Mullin	Flossmoor		60422	US	6/17/2022
Aderomer Saneron	Katy		77493	US	6/17/2022
Lauren Spardello	Wilmington		28412	US	6/17/2022
Heather Hamood	Whitmore Lake		48189	US	6/17/2022
Tania Ruvalcaba	Dallas		75227	US	6/18/2022
Tanya W.	Chicago		60629	US	6/18/2022
Maria Sieds	Appleton		54915	US	6/18/2022
Laura Gurrola	Chula Vista		91910	US	6/18/2022
Paul Allen	Stockton		95206	US	6/18/2022
Destiny Mickens	Smithfield		15478	US	6/18/2022
Imani Sass	Queens		11365	US	6/18/2022
Meera Pradhan	New York		10011	US	6/18/2022
Sophie Watson	Dallas		75212	US	6/18/2022
Gigi Schurtz-Ford	Portland		97219	US	6/19/2022
Daljit Mundi	La Mirada		90638	US	6/19/2022
Kojay Lyvers	Fullerton		92831	US	6/19/2022
Gina Wolford	York		17401	US	6/19/2022

Rianne Van Onzen	Purmerend	NE	1445PN	US	6/19/2022
Marissa Gonzalez	Allentown		18102	US	6/19/2022
S parente	Bayside		11361	US	6/19/2022
Jocelyn lilian bojorges	Bloomington	CA	92316	US	6/19/2022
Esmeralda Arias	Channelview		77530	US	6/19/2022
Josh Manseau	Merrimac		1913	US	6/19/2022
Paola Bravo	Minneapolis		55432	US	6/20/2022
Niloofar Montazeri	Riverside	CA	92508	US	6/20/2022
Lawrence Siska	Schaumburg	IL	60193	US	6/20/2022
Nora Bedoya	Miami		33193	US	6/21/2022
Ronnie Hernandez	Dallas		75211	US	6/21/2022
Denise Brown	Liberty		27298	US	6/21/2022
Jimmy Wright	Paragould		72450	US	6/21/2022
Normeychia Patterson	Fort Mitchell		36856	US	6/21/2022
Jennifer Christensen	Santa Cruz		95060	US	6/21/2022
Joseph Alexander	Indio		92201	US	6/21/2022
Molly Sullivan	Bristol		6010	US	6/21/2022
Regina Brooks	Pittsburgh		15209	US	6/22/2022
Cody Rivera	Winter Springs		32708	US	6/22/2022
Michael Andrews	Sandy		84070	US	6/22/2022
Violet Mize	Salem		97304	US	6/22/2022
Jessi Sanchez	Manhattan		10002	US	6/22/2022
Andy Watts	Houston		77025	US	6/22/2022
Julie Siegel	Antioch	IL	60002	US	6/22/2022
Andrew Calek	Chicago		60652	US	6/22/2022
Roman Wales	Tulsa		74012	US	6/22/2022
Floyd Richardson	Sacramento		95831	US	6/22/2022
Nolan Theman	Springfeild		1056	US	6/22/2022
Zohifa Hanif	Buffalo		14216	US	6/23/2022
Ayaan Khan	Walnut Creek		94596	US	6/23/2022
jimmy Misle	Brooklyn		11237	US	6/23/2022
Richard McConnell	Olympia Fields		60461	US	6/23/2022
Kelsey Ruby	Spearfish		57783	US	6/23/2022
whitney watters	Ormond Beach		32174	US	6/23/2022
Jack Martin	Manchester		5254	US	6/23/2022
Tabatha Lam	Washington		20001	US	6/24/2022
Jailine Rangel	Katy		77494	US	6/24/2022
Andre Vines	Georgetown		78626	US	6/24/2022
Zemyrah King	Charlotte		28208	US	6/24/2022
Amanda Shepherd	Chesapeake		23321	US	6/24/2022
Rebekah Davis	Houston		77006	US	6/24/2022
Alma Parker	Los Angeles	CA	90059	US	6/24/2022
Nina DeWitt	Bellingham		2019	US	6/24/2022
tatiana morales	Oxnard		93035	US	6/24/2022
T Allen	Springfield		97478	US	6/24/2022
Shiloh El-Amin	Slidell		70460	US	6/25/2022
Janet Peterson	Troy		48084	US	6/25/2022

Kaiyla Hopkins	Brandywine		20613	US	6/25/2022
Ciera Gonsales	Ewa Beach		96706	US	6/25/2022
Natile Galindez	Corona		92879	US	6/25/2022
Christian Saunders	Hagerstown		21740	US	6/25/2022
Reagan Harvey	Atlanta		30317	US	6/25/2022
Kai McCombs	Broken Arrow		74012	US	6/25/2022
Lunar Wright	Boise		83702	US	6/25/2022
Ayden Butler	Kansas City		66103	US	6/25/2022
Eleanor Schuebel	Minneapolis		55014	US	6/25/2022
Veronica Aguilera	Riverside	CA	92508	US	6/25/2022
Vanessa Dargain	Albuquerque		87114-9248	US	6/25/2022
Charlotte Berliew	Carthage		64838	US	6/25/2022
Andrea Culver	Dearborn		48126	US	6/26/2022
Kyndall Guerra	Magnolia		77355	US	6/26/2022
Riley McClure	Tucson		85737	US	6/26/2022
ang medina	Bronx		10468	US	6/26/2022
Bryan Barry	Virginia Beach		23464	US	6/26/2022
Brandee Anderson	Gurley		35748	US	6/26/2022
Maddie Fay	Avon		44110	US	6/26/2022
Ava Cauley	Nashville		37222	US	6/26/2022
Kayla Hines	Midlothian		23112	US	6/26/2022
Daniela Sanchez	Costa Mesa		92628	US	6/27/2022
Ethnica Mohanty	Arlington		76013	US	6/27/2022
Letha Andrews	Chicago		60149	US	6/27/2022
Sally Kelton	Mountainside		7092	US	6/27/2022
antonie richey	Bloomingdale		31302	US	6/27/2022
Nadia Aidan			23238	US	6/27/2022
Tori Faere	Atlanta		30305	US	6/27/2022
Ryan Albertson	Palmdale		93551	US	6/27/2022
Erin Hector	Friendswood		77546	US	6/27/2022
Jordin Wheeler	Morrisville		19o67	US	6/28/2022
frank ow	Katy		77494	US	6/28/2022
Tamara Saouaf	Clemmons		27012	US	6/28/2022
Jacklyn Blas	Bay Shore		11706	US	6/28/2022
Spencer Doore	Barrington		3825	US	6/28/2022
Jessica Jimenez	West Covina		91790	US	6/28/2022
Alexandria Vallis	Ypsilanti		48197	US	6/28/2022
Jennayea Paulson	Pequot Lakes		56472	US	6/28/2022
Heather Lamberson	Aurora		80014	US	6/28/2022
CINDY Brooks	Fisherville		40023	US	6/29/2022
Jacqueline Mangham	Rialto		92376	US	6/29/2022
Hannah Ahmed	Lombard		60148	US	6/29/2022
William Adams	Irving		75038	US	6/29/2022
Laurie Parish	Montgomery		12549	US	6/29/2022
Miriam Selassie	Alliance		44601	US	6/29/2022
Alivia Maxcy	Toledo		43613	US	6/29/2022
Vita Anne DuPlanty	Cleburne		76033	US	6/29/2022

Wendy Smith	Riverside	CA	92503	US	6/29/2022
Paul Frith	Coeur D Alene		83815	US	6/29/2022
Karen Renfro	Riverside	CA	92501	US	6/29/2022
Erica Seals	Chicago		60637	US	6/29/2022
Christina Duran	Rivetside	CA	92507	US	6/29/2022
Luis Esquenazi	Miami		33165	US	6/29/2022
Cass Garz	Mcallen		78501	US	6/29/2022
Meredith Helms	New Orleans			US	6/29/2022
Nanette Pratini	Riverside	CA	92507	US	6/29/2022
Carl Craven	Summerville		29483	US	6/29/2022
Kim Miranda	Galveston		77550	US	6/29/2022
Aniya Crespo	Jersey City		7302	US	6/30/2022
India Bell	Baton Rouge		70815	US	6/30/2022
Abram Duclos	Brookline		2446	US	6/30/2022
Gabriella Martinez	San Antonio		75231	US	6/30/2022
Laureen Nitz	Bryan		77807	US	6/30/2022
James Rice	Acworth		30101	US	6/30/2022
Arlene Molina	Pflugerville		78660	US	6/30/2022
Danielle Manahan	Warrenton		20187	US	6/30/2022
Lyric McKee	Van Buren		72956	US	6/30/2022
Paloma de' Campo	Riverside	CA	92506	US	6/30/2022
Joseph Randazzo	Brooklyn		11214	US	7/1/2022
Lauren Clark	Indianapolis		46260	US	7/1/2022
Jahnava Sibilla	Spring Hill		66083	US	7/1/2022
Kim Curry Goldsby	Riverside	CA	92506	US	7/1/2022
Kouroush Aria				US	7/1/2022
Quenna Moore	Rochester		48307	US	7/1/2022
Kerry-Lee Glinski Draizin	Peoria		85383	US	7/1/2022
Ant Mon	Houston		77297	US	7/1/2022
Trevor Babcock	Kennesaw	GA	30152	US	7/1/2022
Mark Fuentes	Los Angeles		90057	US	7/1/2022
Chason Biller	Novi		48374	US	7/1/2022
Brody Boyer	Rossville		60963	US	7/1/2022
maee reyes	Palm Springs		92262	US	7/1/2022
Nicole Keb	San Francisco		94134	US	7/1/2022
Blaise Louwagie	Montevideo		56265	US	7/1/2022
Kira Gelato	Las Vegas		92650	US	7/1/2022
Xinyu UrMom	Queens		urmom	US	7/2/2022
Fallon Hines	Lake Worth		33462	US	7/2/2022
Gavin Frank	Phoenix		85020	US	7/2/2022
Katie Lane	Medford		2155	US	7/2/2022
Mia Espitia	Upland		91786	US	7/2/2022
Broken Spirit	Opelika		36804	US	7/2/2022
Noah L.	Swansea		2777	US	7/2/2022
Benjamin Salas	Lake Worth		33461	US	7/2/2022
Charlie Basile	La Mesa		91942	US	7/2/2022
Stephanie Zavala	Cedar Hill		75104	US	7/2/2022

Rayla Ruelos	Pomona		91766	US	7/3/2022
Elizabeth Trapani	Waimanalo		96795	US	7/3/2022
Alyx Robbins	Elkhart		46516	US	7/3/2022
Isaiah Yanez	Renton		98059	US	7/3/2022
dark afton	Clermont		34715	US	7/3/2022
Declan Con	Towson		21286	US	7/3/2022
Neira Mondragon	Seattle		98107	US	7/3/2022
Luna Simpson	Cincinnati		45236	US	7/3/2022
Justinn martinez	Miami		33147	US	7/4/2022
Emily Miller	Fayetteville		72704	US	7/4/2022
Kay Wilcox	Valdosta		31602	US	7/4/2022
Russ Bunce	Cayce		29033	US	7/4/2022
Isabella Panlilio	Woodland Hills		91406	US	7/4/2022
J Kasperowicz	Norfolk		23503	US	7/4/2022
Francesca Quintos	El Paso		79912	US	7/4/2022
Kevin Todd	Salt Lake City		84121	US	7/4/2022
Katherine Pierce	Hammond		97121	US	7/4/2022
paul miller	Cupertino		95014	US	7/4/2022
Nico Willis	Miles city		59301	US	7/5/2022
Emma Mansfield	Halls		38040	US	7/5/2022
Ahmed Ali	Kalamazoo		49009	US	7/5/2022
Miguel castellanos	Los Angeles	CA	90060	US	7/5/2022
Arie Hornbeak	Indianapolis		46201	US	7/5/2022
Amanda Carpenter	Woodward		73801	US	7/5/2022
kari kalinich	Riverside	CA	92506	US	7/5/2022
spence j	Orange		77632	US	7/5/2022
Jazzy D	Roseburg		97471	US	7/6/2022
Kerri Bisner	Manchester-by-the-Sea	MA	1944	US	7/6/2022
Paul Blackburn	Elizabethtown	KY	42701	US	7/6/2022
Taj Lacey	Detroit		48227	US	7/6/2022
pamela hamilton	Palo Cedro	CA	96073	US	7/6/2022
Ryan Bradley	Newport News		23605	US	7/6/2022
Tiffany Storlie	Antioch	TN	37013	US	7/6/2022
Avery Timbs	Manhattan		66502	US	7/6/2022
Peyton Bury	Round Lake		60073	US	7/6/2022
Willow lagaza	buckeye		85326	US	7/6/2022
Ashlin Sorsby	Marion		78124	US	7/6/2022
Jay Tanaka	Salt Lake City		84116	US	7/7/2022
Ally D	Farmingville		11738	US	7/7/2022
Echo Young	Spotsylvania		22551	US	7/7/2022
Connie Mccarthy	Las Vegas		89166	US	7/7/2022
Savhanna Hawk	Bloomington		47408	US	7/7/2022
Desmund Hockman	Englewood		37329	US	7/7/2022
Manny Cervantes	Bastrop		78602	US	7/7/2022
Regina Snyder	Corsica		15829	US	7/7/2022
Hazel Manlunas	Santa Clara		95051	US	7/8/2022
Meredith Medeiros	Dearing		30808	US	7/8/2022

Greg Somford	Helena		59467	US	7/8/2022
Kevin Ward	Quincy		62301	US	7/8/2022
Cassandra Worko	Ridgewood		11385	US	7/8/2022
Julieann Cox	Chesapeake		23321	US	7/8/2022
Jay Man	West lake		52807	US	7/8/2022
Natasha Whiten	Hephzibah		30815	US	7/8/2022
Victor De Leon	Donna		78537	US	7/8/2022
Jamie Piekarski	Geneva		60134	US	7/8/2022
Kai Washington	Douglasville		30135	US	7/8/2022
Tori Peterson	Cortland		13045	US	7/9/2022
Cheyenne Galt	Oswego		13126	US	7/9/2022
Sage Winchester			8872	US	7/9/2022
Katie Iliffe	Market Harborough		LE16 7LZ	US	7/9/2022
Gina Baxter	San Diego		92128	US	7/9/2022
Jennifer Bilbrey	Lodi		95242	US	7/9/2022
sarah schulz	chippewa falls		54729	US	7/9/2022
Cathy Hackney	Indianapolis		46222	US	7/9/2022
Lissette Gonzalez	Los Angeles		90014	US	7/9/2022
Mary Bell	Wichita		67219	US	7/9/2022
Elizabeth LeVin	Tustin		92780	US	7/10/2022
Emma Sluss	Powell		43065	US	7/10/2022
Arbitrage Andy	New York		10028	US	7/10/2022
Luis Ulerio	Orange		7050	US	7/10/2022
betty winholtz	morro bay	CA	93442	US	7/10/2022
lynn stas	carver		2330	US	7/10/2022
James Miller	Sarasota		34239	US	7/10/2022
Anahi Sanchez	Anaheim		92805	US	7/10/2022
Brenda Choi	Las Vegas	NV	89121	US	7/10/2022
Jack Schoonover	Marksville		71351	US	7/10/2022
Ariella Allen	Poughkeepsie		12601	US	7/11/2022
LoRita Adams	Oakland		94608	US	7/11/2022
Anon ymous				US	7/11/2022
Denise Wedgle	Detroit		48038	US	7/11/2022
Liam Hollingshead	Sand Springs		74063	US	7/11/2022
Kimberly Staggs	Charleston		25003	US	7/11/2022
Star Wilkinson				US	7/11/2022
Mary Dean	Elkton		22827	US	7/11/2022
Eduardo Laborin	Tucson		85706	US	7/11/2022
Debbie E	Felton		19943	US	7/11/2022
John McCrary	Murfreesboro		37128	US	7/11/2022
Natalie Bocanegra	Flushing		11354	US	7/11/2022
Shantavia Griffin	San Diego		92105	US	7/12/2022
Landon Chandler	Alexander		72002	US	7/12/2022
robert cobb	Ormond Beach		32174	US	7/12/2022
Nataliya Yakovleva	Largo		33771	US	7/12/2022
Kaitlyn Tyler	Prairieville		70769	US	7/12/2022
Zyniah Williams	Vallejo		94590	US	7/12/2022

Brian Tinoco Munoz	Vallejo		94591	US	7/13/2022
Amber Parchym	Oak Creek		53154	US	7/13/2022
Doneta Hammer	Chicago		60616	US	7/13/2022
Rolando Jiménez Bonilla	Nueva York		10003	US	7/13/2022
Matthew Reinhart	Pittsburgh		15210	US	7/13/2022
Amanda Davis	Oakland		94605	US	7/13/2022
Robert Hullett	Hickory		28601	US	7/13/2022
wren rosenberg				US	7/13/2022
elliott edwards	everett		98203	US	7/13/2022
Evangelyn Moore				US	7/13/2022
kota wilson	Columbia		65203	US	7/13/2022
Heather Bond	Riverside	CA	92506	US	7/13/2022
HARRY KNAPP	Riverside	CA	92507	US	7/13/2022
Gonzalo Rios	Sacramento		95822	US	7/13/2022
Kaleigh Parker	Dekalb		60150	US	7/13/2022
Debra Mayberry	Los Angeles	CA	90016	US	7/14/2022
Zaynab S	Prosper		75078	US	7/14/2022
Richard Payne	Aloha		97078	US	7/14/2022
Sammy Jones	Bothell		98012	US	7/14/2022
Isabella Jones	Ontario		91764	US	7/14/2022
Lance Kammerud				US	7/14/2022
Adam Jackson	Huntington Beach		92647	US	7/14/2022
renee nelms	Sumner		50674	US	7/14/2022
Nia Alvin	Henrico		23231	US	7/14/2022
Alaina Ross	Beaufort		29901	US	7/14/2022
Thomas Geller	Clifton		7011	US	7/14/2022
Hillary Nicole	Daytona Beach			US	7/14/2022
Dejuan Knight	Baltimore		21201	US	7/15/2022
Corey Hojewski	ForestCity		18421	US	7/15/2022
Pau Boykin	Oak Forest		60452	US	7/15/2022
Wes Cook	Fort Collins		80525	US	7/16/2022
Cora Altizer	Clayton		27527	US	7/16/2022
Eliana Gonzalez	Phoenix		85041	US	7/16/2022
Heather Grames	Shreveport		71105	US	7/16/2022
Tamerra Cantrell	Rialto		92376	US	7/16/2022
Amanda McDonald	Deltona		32725	US	7/16/2022
Cherie Tschida	Denver		80021	US	7/16/2022
Rob Kaminski	berkeley		8741	US	7/16/2022
Eleanor Vander Loon	Byron Center		49315	US	7/16/2022
Chayla Hardy	Douglasville		30135	US	7/16/2022
Brianna Reardon	Fort Myers		33913	US	7/17/2022
Alaina Walls	Selinsgrove		17870	US	7/17/2022
Bryan Deng	San Francisco		94133	US	7/17/2022
Sumer Leger	Edmond		73012	US	7/17/2022
Elizabeth Rivera	Olivehurst		95961	US	7/17/2022
Marilyn Maldonado	Portland		97267	US	7/17/2022
Luis Bucio	Modesto		95350	US	7/18/2022

Margaret Russell	Calabasas	CA	91302	US	7/18/2022
Close it Down	Los Angeles		90044	US	7/18/2022
Tiffany Graham	Saraland		36571	US	7/18/2022
Mickey Lawler	Riverside	CA	92504	US	7/18/2022
emelia matheson	Marietta		30062	US	7/18/2022
Lady Lourdes	Dallas		75270	US	7/18/2022
Tammy Coleman	Tallmadge		44278	US	7/18/2022
Esther Kaufusi	Kearns		84118	US	7/19/2022
Carter Kings	Trenton		48183	US	7/19/2022
Jamie Mckenzie	Fort Lauderdale		33328	US	7/19/2022
Lauren Shamblin	Yorkville		60538	US	7/20/2022
Shawna McGraw	Largo		33771	US	7/20/2022
Josh Standiford	Lake Zurich		60047	US	7/20/2022
rip thatfetus	Edinburg		78539	US	7/20/2022
Miles Seifert	Buffalo		14221	US	7/20/2022
Hhhh Hhhhhhj	Tulsa		74102	US	7/20/2022
MLG ALphA	Mercer Island		98040	US	7/20/2022
Melodi Gulsen	Los Angeles		90066	US	7/20/2022
Alaina Cunningham	Philadelphia		19147	US	7/21/2022
Haroon Khalil	Lorton		22030	US	7/21/2022
g j	Hollywood		33029	US	7/21/2022
Monica Coles	Roanoke		24018	US	7/21/2022
Dante Medori	Jenkintown		19046	US	7/21/2022
Barabara DiGennaro	Pen Argyl		18072	US	7/22/2022
Michele Rehers	Carson		90745	US	7/22/2022
Alissa Rye	Pine Brook		7058	US	7/22/2022
Julio Moran	Merced		95340	US	7/22/2022
Misa Bogdanovic	New York		10012	US	7/22/2022
Dai Huynh	Queens		11435	US	7/23/2022
Emily Da	Baldwin Park		91706	US	7/23/2022
XiaoHua Cheng	Rowland Heights	CA	91748	US	7/23/2022
Christine Bonacum	Coventry		6238	US	7/23/2022
Linda Bescript	Langhorne		19047	US	7/23/2022
Larissa Byrnes	Bethesda		20817	US	7/23/2022
erin snyder	Montebello	CA	90640	US	7/23/2022
Walter McNaughton	Portland		97206	US	7/23/2022
Ron Raz	Ferndale		18921	US	7/23/2022
Edward Broccolo	Philadelphia		19136	US	7/23/2022
Mauricio Vargas	Miami Beach		33141	US	7/24/2022
Rose Lo	Las Vegas		89103	US	7/24/2022
Devin Nassar-Reis				US	7/24/2022
Robert Lynch	Jacksonville	FL	32244	US	7/24/2022
Emma Bockrath	Northport		11768	US	7/24/2022
Keshav Lincoln	Annapolis		21401	US	7/25/2022
Shawn Stuber	Wichita		0.67217	US	7/25/2022
Olivia Aguilar	Lincoln		95648	US	7/25/2022
Daris Dedic	Carlisle		17013	US	7/25/2022

Payton Smith	Inglewood		90301	US	7/25/2022
Grace Schroeder	Pensacola		32514	US	7/25/2022
Justin Hake	El Paso		79912	US	7/25/2022
M. Browning	Chandler		85224	US	7/25/2022
Melissa Burgess	south boston		2127	US	7/25/2022
Ana Plasencia	Lakeland		33813	US	7/25/2022
Theresa Thomas	Fontana		92331	US	7/25/2022
Alexandria Duong	Irvine		92620	US	7/25/2022
soac soac	Davisburg		48350	US	7/26/2022
Just Jones	Los Angeles		90060	US	7/26/2022
sophia turcoliveri	Medina		44256	US	7/26/2022
phil Mhm	Oscoda		48750	US	7/26/2022
Eldamian Mantique	Akron		44313	US	7/26/2022
Maddie Misch	Manhattan Beach		90266	US	7/26/2022
kevin head	mira loma		91752	US	7/26/2022
Liz Itzler	Philadelphia		19146	US	7/26/2022
Callista Fisher	Willard		65781	US	7/26/2022
Omont Mitchell	Anderson		29625	US	7/26/2022
Jamie Bridges	Bayfield		81122	US	7/26/2022
Amelia Charis Coker	Argyle		76226	US	7/26/2022
Gloria Aman	Asheville		28801	US	7/26/2022
Kristi Akins	Indianapolis		46254	US	7/26/2022
Nashalee Rosado	Springfield		1151	US	7/26/2022
Amanda Garver	Albuquerque		87111	US	7/26/2022
Jodi Wayne	Woodman	WI	53827	US	7/27/2022
Melissa A	Murrieta		92562	US	7/27/2022
Peyton Pierce	Elizabethtown		42701	US	7/27/2022
Amy Schlotfeldt				US	7/27/2022
Jeffery Lawless	Chino		91710	US	7/27/2022
Hershey Marie Maltman- Blanco	san diego		92111	US	7/27/2022
Dav .	Mckinney		75071	US	7/27/2022
Megan Thompson	Cincinnati		45238	US	7/27/2022
Pastor Sharon	Houston		77039	US	7/27/2022
Ben Staggs	Hartford		40175	US	7/28/2022
Caleb Chapman	Fuquay-Varina		27526	US	7/28/2022
Maggie Lobo	Zion		69009	US	7/28/2022
Vince Mendieta	Austin		78745-3421	US	7/28/2022
Jane Collins	Glen Head		11545	US	7/28/2022
Liz Farina	Bronx		10461	US	7/28/2022
Zane Say	Austin		78704	US	7/28/2022
José Legs	Copperas Cove		76522	US	7/28/2022
Annie Xu	Brooklyn		11204	US	7/28/2022
Jayda Yunik	Meadville		16335	US	7/29/2022
Crystal Wall	Indianapolis		46224	US	7/29/2022
Justin Kaufman	Fort Wayne		46815	US	7/29/2022
Kylie Olesevich	Onalaska		54650	US	7/29/2022
Billie Grace	Hopkinsville		42240	US	7/29/2022

Shalin Fox	Lakeland		33813	US	7/29/2022
Nicole Scarpett	Key Biscayne		33149	US	7/29/2022
Megan Krantz	Minneapolis		55418	US	7/29/2022
Alan Huse	Princeton	NJ	8540	US	7/29/2022
John Garcia	Orlando		32808	US	7/30/2022
Tallen Gibbons	South Jordan		84095	US	7/30/2022
Kathy Wickline	Fountain Inn		29644	US	7/30/2022
Daphne Belle	Knoxville		37917	US	7/30/2022
Arline Lohli	Las Vegas		89129	US	7/30/2022
Ashely Coleman	Jackson		39211	US	7/30/2022
Shaphen Robinson	Hamilton		45013	US	7/30/2022
Hannah Coy	Clarksville		47129	US	7/30/2022
Joshua Hunter	East Rochester		14445	US	7/30/2022
Carlos Sacramento	Smyrna	GA	30080	US	7/30/2022
sophie gazda	Charlotte		28202	US	7/30/2022
Lani Spooner	Flint		48506	US	7/30/2022
Aaron Wheeler	Henderson		89015	US	7/31/2022
Beepers Clown	Foothill Ranch		92610	US	7/31/2022
Jessica Davis	Wharton		77488	US	7/31/2022
Kathryn Brody	Buffalo		14214	US	7/31/2022
Alexandria Huie	Atlanta		30340	US	7/31/2022
Cahen Barret	Minneapolis		55404	US	8/1/2022
Justin Epperley	Roanoke		24013	US	8/1/2022
Mahesh Rajapakse	Moorhead		56560	US	8/1/2022
Jeanette Bartholomew	Hillsborough		8844	US	8/1/2022
Trish Novello			75245	US	8/1/2022
Ethan Jarvis	Kent		44240	US	8/1/2022
Samantha Warner	Staten Island		10314	US	8/1/2022
Danielle Doucette	Reynoldsburg		43068	US	8/2/2022
Sam Rego	Fall River		2721	US	8/2/2022
Courtney Morgan	Ludowici		31316	US	8/2/2022
Sam Zechman	La Grange Park		60526	US	8/2/2022
Tucker Sheely	Buffalo		14228	US	8/2/2022
Kerstin Fogle	Olympia		98501	US	8/2/2022
Karen Kinstley	Riverside	CA	92504	US	8/2/2022
Carmen Mendoza	Santa Ana		92707	US	8/2/2022
Cooper Caldwell	Johnstown		15906	US	8/2/2022
Corey Meyers	Lakeland		33809	US	8/3/2022
Katy Roberts	Johnston City		62951	US	8/3/2022
Daniela Hernandez	Lawrenceville		30043	US	8/3/2022
jessica Gebhardt	Millville		8332	US	8/3/2022
Sandra Bell	York	PA	17403	US	8/3/2022
Danielle Cahn	Short Hills		7078	US	8/3/2022
Autumn Colin	Hamburg		14075	US	8/3/2022
Amber Elliott	Woodway		76712	US	8/3/2022
Kuromi Is Bae	Loganville		30052	US	8/3/2022
daniel hansen	Fort Worth		76148	US	8/3/2022

Alex Hansen	Medford		2155	US	8/3/2022
Amanda Shaw	Indianapolis		46202	US	8/3/2022
Vince Mazzola	Rancho Cordova		95670	US	8/3/2022
April Glatzel	Riverside	CA	92506	US	8/4/2022
Yisel C	Atlanta		30308	US	8/4/2022
Raelyn Cooper	Atlanta		30308	US	8/4/2022
Jhon Ortiz	Lynn		1902	US	8/4/2022
barry armstrong	clovis		93619	US	8/4/2022
Ruth Rusch	Fayetteville		72701	US	8/4/2022
Kaylee Williamson	La Grange		40031	US	8/4/2022
Zach afton	Bristol		19007	US	8/4/2022
Luella Collins-Ziviski	Grand Rapids		49512	US	8/4/2022
Linda Bailey	Riverside	CA	92506	US	8/4/2022
Mailee Torgerson	El Cajon		92021	US	8/4/2022
alvaro jurado	Fairfax		22038	US	8/5/2022
Mason Allord	Saint Paul		55116	US	8/5/2022
Fabian Priftaj			11103	US	8/5/2022
Shyann Gray	London		40744	US	8/5/2022
Leila Terrell	Jacksonville		32221	US	8/5/2022
Hannah DiGangi	Rockaway		7866	US	8/5/2022
Catherine Williams	Joplin		64804	US	8/5/2022
Hian Gabriel	Little Elm		75068	US	8/5/2022
Britt Orleans	Panama City Beach		32413	US	8/5/2022
Joshua Navarette	Modesto		95354	US	8/5/2022
Wanda Roberson	Milton		32583	US	8/5/2022
Nan Zhu	Buffalo		14221	US	8/6/2022
joseline marquez	El Cajon		92019	US	8/6/2022
Angelo Perez	Antioch		94509	US	8/6/2022
Richard McGinley	Tampa		33604	US	8/6/2022
No One	Youngsville		70592	US	8/6/2022
Rajanil Bautista	San Jose		95132	US	8/6/2022
Valerie Staton	Little Rock		72201	US	8/6/2022
Bob Rosen				US	8/6/2022
Peter Kahigian	Haverhill		1832	US	8/7/2022
Miori Cartalia	Chicago		60618	US	8/7/2022
Liah S	Anchorage		99501	US	8/7/2022
Melissa Long	Milwaukee		53210	US	8/7/2022
Christian Ruiz	South Lake Tahoe		96150	US	8/7/2022
Gina Keaveny	Cleburne		76033	US	8/7/2022
Yanina Hodanovich	Hawthorne	NJ	7506	US	8/7/2022
Carly Hector	Newnan		30263	US	8/7/2022
Norris White	London	GA	33476	US	8/7/2022
Marlee Garcia	Jamul		91935	US	8/7/2022
Lakai williams	Arlington		22203	US	8/7/2022
Karina Anderson	San Diego		92138	US	8/7/2022
Michael Andrews				US	8/8/2022
Carrie Renes	Mount Pleasant		29466	US	8/8/2022

lydia overbey	Garner		27529	US	8/8/2022
Brittany Mills	Kokomo		46091	US	8/8/2022
Karen Carmichael	Bonita Springs		34135	US	8/8/2022
Ilyssa Halbreich	Plainview		11803	US	8/8/2022
Dana Baker	New Pine Creek		97635	US	8/8/2022
Steven Esparza	Dallas		75243	US	8/8/2022
Yessica Garza	Lawrenceville		30044	US	8/8/2022
Barbie Marquet	Fort Lauderdale		33317	US	8/8/2022
Suzanne Gaudreau	Banning	CA	92220	US	8/10/2022
eleny Kard	Riverside	CA	92503	US	8/13/2022
Nancy Magi	Denver	CO	80211	US	8/15/2022
Patrick Rutten	Corona	CA	92882	US	8/15/2022
Cynthia Cordova	Riverside	CA	92503	US	8/20/2022
Ray Carlone	Ontario	CA	91762	US	8/22/2022
Kimié Walling	Los Angeles	CA	90060	US	8/31/2022
Crystal Gonzalez	Perris	CA	92571	US	9/6/2022
C. Ferreira	Edison	NJ	8820	US	9/16/2022
Jacqueline Alvarado	Bloomington	CA	92316	US	9/19/2022
Robert Hyers	Riverside	CA	92504	US	10/13/2022
Jacqueline Garcia	San Antonio	TX	78216	US	11/10/2022
Kristen Falek	Aquebogue		11931	US	12/4/2022
karla cervantes	mead valley	CA	92570	US	12/7/2022
Nathan Wilets	Bethesda		20817	US	12/12/2022
Ozgur Guney	Montréal		H7N5N2	US	12/23/2022
Norman Manary	Riverside	CA	92509	US	12/28/2022
Thomas Perkins	Riverside	CA	92506	US	12/28/2022
Todd Wales	Riverside	CA	92506	US	12/28/2022
Perry Gx	Tustin		92780	Australia	1/3/2023
Cathy Dolbec	Littleton	NH	3561	US	1/8/2023

Letter I-4

Jen Larratt Smith
January 10, 2023

I-4.1 This comment transmits petition comments and names referenced in Comment I-2.1 to the March JPA. This comment does not include any specific issues or concerns regarding the environmental analysis in the Draft EIR; as such, no such, no further response is provided.

I-4.2 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Lenora Mitchell 3/31/2022	"Riverside or Warehouse-side: where do you want to live?"	No environmental issues are raised; comment noted.
Violet Rugh 4/1/2022	"We need open land."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land.
Kevin Castellanos 4/1/022	"More parks, orange groves, and housing. No more warehouses, mundane jobs or cheap labor!!!"	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. No environmental issues are raised; comment noted.
Esther Cervantes 4/2/2022	"We do no need more warehouse near our homes."	No environmental issues are raised; comment noted.
Cheryl Voss 4/2/2022	"Our streets and highways are already neglected and traffic is horrid. As residents, the last things we need or want are more pot holes caused by trucks and an infrastructure that can't support the increased traffic."	The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. Commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[1]

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

Commenter Comment Date	Comment	Response
Jiovanni Hernandez 4/2/2022	"Stop building so many warehouses."	No environmental issues are raised; comment noted.
Karissa Hammar 4/2/2022	"There are already too many warehouses in our area. I enjoy looking at and walking in and around the areas of nature. They improve my quality of life."	The Project includes a 445.43-acre Conservation Easement with existing trails for passive recreational use. No environmental issues are raised; comment noted.
MARisol Lomeli 4/2/2022	"I love sycamore"	No environmental issues are raised; comment noted.
Cindi Robertson 4/2/2022	"Riverside has enough warehouses and not enough nature areas. This is not needed and only wanted for financial greed."	The Project includes a 445.43-acre Conservation Easement with existing trails for passive recreational use. No environmental issues are raised; comment noted.
Kelly Wrightstone 4/2/2022	"No more warehouses!"	No environmental issues are raised; comment noted.
Jennifer Stoever 4/2/2022	"We need wilderness areas to walk and bike!!"	The Project includes a 445.43-acre Conservation Easement with existing trails for passive recreational use. No environmental issues are raised; comment noted.
Elizabeth Young 4/2/2022	"We have more than enough warehouses! We need open spaces for families to enjoy recreation. Bike paths, walking, fishing, etc. Orange County has some beautiful open spaces for families amid their concrete so we can too!!!"	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. No environmental issues are raised; comment noted.
Priscilla Adair 4/2/2022	"I live in this neighborhood, and the big trucks coming through for the warehouses are destroying our streets"	The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. No environmental issues are raised; comment noted.
Charissa Adams 4/2/2022	"The area doesn't need more semi truck traffic and smog. Don't decimate the land our wildlife has left"	Recirculated Section 4.2, Air Quality, includes an analysis of air quality impacts. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

Commenter Comment Date	Comment	Response
		The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land.
Rose Daniels 4/2/2022	"I work in Riverside. More warehouses will"	No environmental issues are raised; comment noted.

I-4.3 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Tracie Rodrigues 4/3/2022	"There are no places to walk or play anymore"	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. No environmental issues are raised; comment noted.
Sherry Miller 4/3/2022	"I live here and I don't want to live in an industrial zone"	Recirculated Section 4.10, Land Use and Planning, evaluates land use impacts.
Tina Ely 4/3/2022	"Stop building industrial buildings a majority of them sit empty for years build more walking areas for hiking and for biking. How about a big park for our kids to play i was in AZ and there Parks are beautiful for kids."	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use.
Noelle Chamberlain 4/3/2022	"We need some natural, open space in this city preserved before it's all gone!"	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land.
Claudia Cervantes 4/4/2022	"Our children need the nature, why take that away from them?"	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land.
Dianna Hentzschel 4/5/2022	"We have enough warehouses and traffic in this area. We need to keep some recreational area of active and healthy."	The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine

Commenter Comment Date	Comment	Response
		traffic impact and mitigation measures for CEQA. The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use.
Sherry Marshall 4/5/2022	"My father was an avid mountain biker and enjoyed this place so much. He spent that last moments of his life on these trails. He built a community of friends and spent time with them on this trail, enjoying the city he lived in, the wildlife out on these trails. You can see the warehouses encroaching on this are and it would be terrible to loose these recreational areas and all the amazing wildlife that live and thrive in this natural area. You would displace an ever decreasing amount of area that is home to this wild life. Some amazing huge birds that nest in the trees out here. Please keep it wild and open."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails available for passive recreational use. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.

I-4.4 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Sherry Marshall 4/5/2022	"There are so few places for people to go and just enjoy time away from city life without packing up and going away. This area also gets the community out there moving and meeting others in their community. Please don't take this area for warehouses. The wildlife that this u developed area houses is amazing and so beautiful. You would be displacing so many. What a shame losing this trail would be. Please share on your FB pages and social media accounts."	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.
Rafael Jimenez 4/5/2022	"I'm signing because my neighborhood is going to be directly affected by these warehouses. If built as planned, these mega-warehouses will be surrounded by homes on three sides, including mine. This undeveloped area is the only buffer left between our neighborhoods and the hundreds of warehouses going up by the 215 Freeway, south of the 60 Freeway interchange."	The Draft EIR analyzes the Project's impacts to neighboring communities. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. No environmental issues are raised; comment noted.
Eric Walker 4/6/2022	"Enough is enough. We need wilderness to thrive not useless buildings serving people who live in areas without warehouses and a Better Quailty of life! We want and deserve better."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will

Commenter Comment Date	Comment	Response
		remain open land. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.
Dawn Villavicencio 4/7/2022	"I want to keep the peace and quiet that we all currently enjoy, keep the wildlife and serenity that nature provides"	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources and noise impacts in Section 4.11, Noise.
Ang Mum 4/7/2022	"No more warehouses"	No environmental issues are raised; comment noted.
Kristy Bauer 4/7/2022	"This lot is directly behind my backyard"	No environmental issues are raised; comment noted.
Helena Craig 4/7/2022	"We do not need anymore warehouses or wildlife being destroyed!"	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.
Maria Garde 4/7/2022	"That open space is lovely right behind the church and a testament to God's serenity. We don't need more traffic, pollution, etc."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. Air quality impacts are evaluated in Recirculated Section 4.2, Air Quality. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Amanda Gomez 4/7/2022	"No more trucks up Van Buren."	The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine

Commenter Comment Date	Comment	Response
		traffic impact and mitigation measures for CEQA.

I-4.5 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Gabriela Mendez 4/8/2022	"I would like to preserve this green space and warehousing should not be placed next to sensitive receptors!"	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. Impacts to sensitive receptors are evaluated throughout the Draft EIR, including in Section 4.1, Aesthetics, Recirculated Section 4.2, Air Quality, Recirculated Section 4.8, Hazards and Hazardous Materials, Recirculated Section 4.10, Land Use and Planning, Section 4.11, Noise, and Section 4.18, Wildfire.
Gina Binhimaid 4/8/2022	"Too much traffic and pollution already!!"	The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. Recirculated Section 4.2, Air Quality evaluates air quality impacts.
Michael Kaudze 4/8/2022	"We don't need the warehouses. Keep the land green."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. No environmental issues are raised; comment noted.
Terry Smith 4/8/2022	"Our land needs our protection. There's enough traffic and whearhouses. Keep them out of our neighborhoods!"	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and

Commenter Comment Date	Comment	Response
		does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Victoria Bavier 4/8/2022	"My family uses these trails every single day either to walk our dogs, run, bike, or hike. It would be a shame to lose this beautiful preserve!"	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. No environmental issues are raised; comment noted.
Marc Feldstein 4/9/2022	"We live kiddie-korner to the barton/alessandro distribution center.1. Barton goes only 2 blocks north and south of alessandro. There is no room for this development.2. This puts a significant burden on public safety where the police department is lacking 20 officers and the fire department would need to engage in multiple change of quarters once the site is complete.3. The area has significant, severe vehicle accidents and this will only make that worse.4. A common concern on highways and local streets is semi trucks and this doubles or triples the semis in the area."	The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The Draft EIR evaluates impacts to public services in Section 4.13, Public Services. See Topical Response 6 – Meridian Fire Station, regarding the construction of the Meridian Fire Station. The Draft EIR evaluates transportation hazards impacts under Threshold TRA-3 in Section 4.15, Transportation.
Mark Lien 4/10/2022	"I do not want warehouses by the old March ammunition storage area."	No environmental issues are raised; comment noted.
Doug Bailey 4/14/2022	"No more warehouses, no more traffic, no more people"	The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. The Draft EIR evaluates population impacts in Section 4.12, Population and Housing.

I-4.6 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Gary Williams 4/16/2022	"I have lived in this area for 16 years, and I frequent this area on my bike several times per week. As warehousing proliferates in this area, and more open space gets built on, the disappearing habitat for wildlife is creating a litany of impacts for those threatened species, and for local residents and pet owners as well. These are open spaces that will disappear forever."	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.
Aaron Rolens 4/19/2022	"The warehouse development around here is ridiculous."	No environmental issues are raised; comment noted.
Sandi Cabrera 4/20/2022	"Pollution, traffic, displacement of precious wildlife(hawks, eagles, coyotes and protected species KRats. Too close to schools, churches and parks- (diesel fumes.) Ruining our community and decreasing property values."	Recirculated Section 4.2, Air Quality, evaluates air quality impacts, and Section 4.3, Biological Resources, evaluates wildlife impacts. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Jill McCormick 4/20/2022	"I'm glad to see a petition about this as it's been a concern of mine and the negative impact on surrounding neighborhoods as well as the wildlife. It might be super helpful to others if a clear map or full description of the boundaries was included with the petition pages."	Recirculated Chapter 3, Project Description, includes a full Project Description and site plan showing Project Boundaries. Section 4.3, Biological Resources, evaluates impacts to wildlife and Recirculated Section 4.10, Land Use and Planning, land use compatibility impacts.
Sara Sara A Martinez 4/23/2022	"I oppose the building of more warehouses as it will have a negative impact on wildlife and cause more pollution."	Recirculated Section 4.2, Air Quality, evaluates air quality impacts, and Section 4.3, Biological Resources evaluates impacts to wildlife.
Stacey Guzman 4/25/2022	"My daughter is on the mountain bike team at Woodcrest Christian and the team practices twice a week. It's so Nice to see young kids out around nature."	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. No environmental issues are raised; comment noted.

Commenter Comment Date	Comment	Response
Selena Wilson 4/27/2022	"No more warehouse! Enough already. NO!!!!"	No environmental issues are raised; comment noted.
Sara Lopez 4/28/2022	"i want to keep riverside green"	No environmental issues are raised; comment noted.
Alma Brigandi 4/28/2022	"To much traffic"	The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Ashley Trumbull 4/28/2022	"This is our home we need a nice area not to be run down."	No environmental issues are raised; comment noted.

I-4.7 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Kevin Conklin 4/28/2022	"I don't want gross air and noise pollution in their back yards. In a canyon where all the noise will be amplified and carry well past the homes on the edge. Enough of Fontana is already here."	The Project site is not located in a canyon. Recirculated Section 4.2, Air Quality, evaluates air quality impacts and Section 4.11, Noise, evaluates noise impacts.
Corinne Perez 4/30/2022	"The City, Joint Powers and Developers can say or work for the outcome they want. How can an environmental study be completed when the warehouses and traffic of 3500 jobs are not here yet? There are plenty of empty warehouses. Think about that, City Counsel espoused at a meeting last year that we should be grateful this will bring 3500 jobs to the area. Presently, there are plenty of jobs that employers can't fill. This means 3500 cars and trucks in our neighborhood all competing for access to and on 215 or Van Buren. Out neighborhood is locked in and does not have enough emergency egress/ingress. Once it is allowed, we won't know the damage to the local population until well after this project is complete, people and property has been damaged, making it too late. They should review environmental studies of Los Angeles neighborhoods that have truck freight traffic. There is plenty of vacant desert land, move out."	Section 4.12, Population and Housing, discusses jobs, and Recirculated Section 4.8, Hazards and Hazardous Materials, Section 4.15, Transportation, and Section 4.18, Wildfire, discuss emergency access and egress See also, Topical Response 5 – Jobs. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Connie Austin 4/30/2022	"I like rural"	No environmental issues are raised; comment noted.

Commenter Comment Date	Comment	Response
Eunice Ramirez 4/30/2022	"Ton many warehouses that are polluting the air."	Recirculated Section 4.2, Air Quality evaluates air quality impacts in.
Toni Sandell 5/1/2022	"The VOTERS in this area are being ignored by our politicians who are bowing to big money."	No environmental issues are raised; comment noted.

I-4.8 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Peggy Matthews 5/2/2022	"This is ridiculous!!! Isn't there enough warehouses in Riverside area already? Or in the I. E. area period? STOP THE HOUSING AND COMMERCIAL BUILDING ALREADY! You are taking homes from what little of wild life we have left in Riverside. It's bad already that the wild life is having to come deeper into city limits looking for food or a place to make a home. It won't be much longer before our coyote's, road runners, snakes, bob cats, etc end up on the endangered species list because they are being kicked out of their natural habitats and being forced to go deeper into the city, which then puts them at more risk of being killed. It's sad to look around here and see all the unnecessary buildings that once were beautiful wild life areas.Where do you expect Riverside residents to jog, bike, walk, or even hike? Let me guess the bike trail near Fairmount Park? I think not. It's more dangerous now than I ever known it to be and I was born in Riverside and raised here. I've been here 40 years.And what about our health,"	The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. Further, a Revised Health Risk Assessment Technical Report was prepared analyzing Project construction and operation (Appendix C-2). As summarized in Recirculated Section 4.2, Air Quality, the Project would not result in significant impacts such that health impacts would occur to surrounding residences during construction and operation. Please see Recirculated Section 4.2, Air Quality for the discussion of cumulative health risks from toxic air contaminants.

I-4.9 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Peggy Matthews 5/2/2022	"This is ridiculous!!! Isn't there enough warehouses in Riverside area already? Or in the I. E. area period? STOP THE HOUSING AND COMMERCIAL BUILDING ALREADY! You are taking homes from what little of wild life we have left in	The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources. The Project includes 17.72 acres of open space along with the

Commenter Comment Date	Comment	Response
	Riverside. It's bad already that the wild life is having to come deeper into city limits looking for food or a place to make a home. It won't be much longer before our coyote's, road runners, snakes, bob cats, etc end up on the endangered species list because they are being kicked out of their natural habitats and being forced to go deeper into the city, which then puts them at more risk of being killed. It's sad to look around here and see all the unnecessary buildings that once were beautiful wild life areas.Where do you expect Riverside residents to jog, bike, walk, or even hike? Let me guess the bike trail near Fairmount Park? I think not. It's more dangerous now than I ever known it to be and I was born in Riverside and raised here. I've been here 40 years.And what about our health,"	establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses.
Rose Cook 5/2/2022	"Riverside is irresponsibly approving warehouse developments adjacent to residential neighborhoods with no regard for the people who live there. They even put one in my neighborhood, right across the street from a middle school. "Legal" doesn't make it right. Nobody invests in a home expecting a massive warehouse next door, with all of the truck traffic and pollution they bring. This has to stop! We need careful, thoughtful planning that respects human health, quality of life, and our environment!"	Recirculated Section 4.2, Air Quality, evaluates air quality impacts. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
N V 5/4/2022	"Nou Verrett"	No environmental issues are raised; comment noted.

I-4.10 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
M E 5/4/2022	"Quality of life matters…noise, pollution, traffic congesting our already packed roads, impacting the streets our children travel to school on and family neighborhoods."	Recirculated Section 4.2, Air Quality, evaluates air quality impacts and Section 4.11, Noise, evaluates noise impacts. The

Commenter Comment Date	Comment	Response
		Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Michele Cole 5/5/2022	"I live in this neighborhood and this will take away the safe area we have. The park, baseball and softball fields won't be safe for our children to play at anymore due to the additional traffic on our streets!"	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Marie Rodriguez 5/5/2022	"I agree with the statements about residents should come first We all knew living here would mean MILITARY planes, and, we learned that the almighty dollar was so important that we were not talked to about 2 ups and 3 Amazon planes every day. So now they want to allow truck traffic right in our front door. Oh they'll say they are going to make it difficult for trucks, but, how many times	The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus

Commenter Comment Date	Comment	Response
	have you seen trucks make a U-turn on Meridian and go north on Van Buren heading to the 91. We were promised shopping on Van Buren and Barton Instead we get more vacant warehouses. When does it stop. March stopped being an active base before I moved here in 1995. So it's BS about jobs it's about filling up the buildings. Anyone who tries to get around here during school arrivals and departures knows what a mess that is, now add more trucks in the neighborhoods and no one will be able to move. As it is now in the morning's btw Van Buren and Allesandro on Trautwein it can take 30-45 minutes to go 2.5 miles. At th"	Avenue. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. The Draft EIR discusses jobs in Section 4.12, Population and Housing. See also, Topical Response 5 – Jobs.
James Thomson 5/6/2022	"The 1st phase already killed most of my view, "The reason I bought it in the 1st place over 20 years ago when it was a Stephens Kangaroo preserve and would never be developed!!!!!"	The Draft EIR evaluates aesthetics impacts in Section 4.1, Aesthetics, and impacts to Stephens Kangaroo rats in Section 4.3, Biological Resources. See Response I-11.4, below, regarding the March JPA General Plan and intention for the development of the Project site.

I-4.11 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Sally Quintana 5/8/2022	"We don't need any more warehouses! Don't need the additional traffic!"	The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

Commenter Comment Date	Comment	Response
Sharon Gate 5/11/2022	"I don't want anymore where houses near my home!"	No environmental issues are raised; comment noted.
Margaret Gate 5/11/2022	"We need the natural wilderness areas for hiking, biking and wildlife."	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.
Prisela Gonzalez 5/14/2022	"Because I choose to live here because of the openness and nature around us. Can't even see the mountains anymore"	The Draft EIR evaluates aesthetic impacts in Section 4.1, Aesthetics. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land.
Marcine McBride 5/15/2022	"Too much development is destroying the ambiance of people's neighborhoods, destroying the environment, and driving wildlife to extinction. It's creating more air pollution, light and noise pollution, soil and wastewater pollution, traffic congestion, heat, and garbage. The people already living there have the rights over the developers who want to destroy this land."	Section 4.1, Aesthetics, evaluates lighting impacts, Recirculated Section 4.2, Air Quality, evaluates air quality impacts, Section 4.3, Biological Resources evaluates wildlife impacts, Section 4.6, Geology and Soils, and Recirculated Section 4.8, Hazards and Hazardous Materials, evaluate soils impacts, Section 4.11, Noise, evaluates noise impacts, and Section 4.17, Utilities and Service Systems, evaluates wastewater and solid waste impacts. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Suzanne Page 5/15/2022	"Why the constant need to build on open spaces? Drive down Van Buren and you'll find that there are already too many warehouse's. The "jobs" are low paying and the environmental impact is too great.Certainly our city leadership can do better."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. The Draft EIR includes a full analysis of the Project's potential environmental

Commenter Comment Date	Comment	Response
		impacts throughout Chapter 4, Environmental Analysis.
Kaitlin Munoz 5/16/2022l	"I dont need more warehouses around our home!"	No environmental issues are raised; comment noted.
Hector Luna 5/16/2022	"No more warehouse"	No environmental issues are raised; comment noted.
Crystal Blystone 5/16/2022	"I am a resident of Moreno Valley and I do not believe building warehouses brings more jobs to Moreno Valley. A warehouse job is not promising and it will only create more people commenting to our city. This is create worst air and road conditions. This is not a good use of land and should not be continued to be built. We already have too many warehouses and some are empty."	The Draft EIR discusses jobs in Section 4.12, Population and Housing. See also, Topical Response 5 – Jobs. Recirculated Section 4.2, Air Quality, evaluates air quality impacts. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Mayra Sigalaandrade 5/17/2022	"A lot of warehouses but low income salaries"	No environmental issues are raised; comment noted.

I-4.12 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Gerri Vaughn 5/17/2022	"Gerri vaughn"	No environmental issues are raised; comment noted.
Manny DeBaca 5/17/2022	"I want to keep open spaces for my grandchildren and their kids. Riverside is already to crowded. We need to keep open spaces open."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land.
Teresa Chavez 5/17/2022	"These warehouses are bringing the value of our homes down, the traffic is insane in the mornings and the make our city ugly!"	The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. The Draft EIR evaluates aesthetic impacts in Section 4.1, Aesthetics.

Commenter Comment Date	Comment	Response
Jonathan Mota 5/17/2022	"They should put real things that could make the cities look nice and help out local cities	No environmental issues are raised; comment noted.
Nidia Santiago 5/17/2022	"I am a concerned and affected resident"	No environmental issues are raised; comment noted.
Hector Rodriguez 5/17/2022	"Hector Rodriguez"	No environmental issues are raised; comment noted.
Elias Valencia 5/17/2022	"Somethings are more important than money!"	No environmental issues are raised; comment noted.
Claudia Rodriguez 5/17/2022	"Building warehouse worsens quality of air and creates high traffic of semi trucks. The community does not benefit by having tons of warehouses. We want to protect the wildlife and the environment."	Recirculated Section 4.2, Air Quality, evaluates air quality impacts and Section 4.3, Biological Resources, evaluates wildlife impacts. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Lorena Alvidrez 5/17/2022	"Because i live near these damn warehouses!! Truck drivers in our neighborhoods!! Absolutely ridiculous"	The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue.
Davin Tate 5/17/2022	"I would like more actual restaurants grocery stores shopping malls built instead of warehouses"	No environmental issues are raised; comment noted.
Audrey Sanchez 5/17/2022	"We don't need more empty warehouse. Make more homes parks etc fir the cummunity!	The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. No environmental issues are raised; comment noted.
Bryanna Gonzalez 5/17/2022	"It's bad for our health"	Recirculated Section 4.2, Air Quality, includes an analysis of potential health effects in.
Hector Bautista 5/17/2022	"Tired of all these new warehouses polluting and bringing traffic and affecting the wild life (birds) out here."	Recirculated Section 4.2, Air Quality, evaluates air quality impacts and Section 4.3, Biological Resources, evaluates

Commenter Comment Date	Comment	Response
		impacts to wildlife. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

I-4.13 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
William Jones 5/17/2022	"i'm signing because there is no reason for these warehouses to destroy what little nature we have left. Riverside sets itself apart from the surrounding cities because it isn't completely overrun by warehouses like Moreno Valley, Fontana, Bloomington, etc. We aren't in need of the extra jobs, and instead we should be focusing on the existing opportunities that lie in our city's long-standing businesses."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. The Draft EIR discusses jobs in Section 4.12, Population and Housing. See also, Topical Response 5 – Jobs. No environmental issues are raised; comment noted.
Desiree De La Rosa 5/17/2022	"we have enough to warehouses >:(it's bad for the native animals"	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.
Naomi Sampson 5/18/2022	"I moved away from the area a couple of years ago and whenever I visit I was so excited for all the memories. Hiking! The animals! The overall outdoor experience that I grew up on and every time I visit the fields I once knew are filled with new buildings, housing, warehouses, etc! The Burroughs in Moreno Valley are already being pushed out and losing there homes and now this. When will it end? Children and families deserve the ability to enjoy the outdoors close to home and the animals deserve to keep their homes."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.
Nancy Garcia 5/18/2022	"WE NEED DIFFERENT TYPES OF BUILDINGS NOT JUST WAREHOUSES ITS SO ANNOYING THAT OTHER CITIES GET NICE RESTAURANTS OR MORE	No environmental issues are raised; comment noted.

Commenter Comment Date	Comment	Response
	STORES BUT WE GET MORE ANNOYING WAREHOUSES"	
Yadira Camarena 5/19/2022	"No more warehouses. We have too many of them already"	No environmental issues are raised; comment noted.
Gerardo Gonzalez 5/19/2022	"Moreno Valley doesn't need anymore warehouses."	No environmental issues are raised; comment noted.
Jason Gonsman 5/21/2022	"I'm a mountain biker and this area is pack with so many animals and birds."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.

I-4.14 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Sara Amend 5/21/2022	"We've been walking this area for years. A peaceful getaway from traffic & crowds. Warehouses don't need to take up every available piece of land around us."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.
Mark Lien 5/22/2022	"No more warehouses next to our homes. Does this ward pay the highest real estate taxes in the county? Is it not enough to keep the land undeveloped?"	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. No environmental issues are raised; comment noted.
Cheryl Gutierrez 5/22/2022	"We already have too many warehouses & trucks to go with them!"	The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can

Commenter Comment Date	Comment	Response
		only be accessed via Cactus Avenue. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Lon Walcker 5/25/2022	"The mandate to replace lost jobs has been met with millions of square feet of warehouse space recently built on appropriate flat land in the "corridor". This goal has been met and should eliminate any economic pressure for more warehouses. This piece of remaining land that hasn't been built out yet would require massive grading of the hills and valleys to accomodate huge buildings and massive truck traffic, virtually eliminating an entire ecosystem. What sort of city builds vibrant communities around existing open space (federal land) then later decides to put warehouses and trucks in the center of it all?WTF?"	The Draft EIR discusses jobs in Section 4.12, Population and Housing. See also, Topical Response 5 – Jobs. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. The Draft EIR evaluates impacts to biological resources in Section 4.3, Biological Resources. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.
Rigo Estrada 5/30/2022	"The condition of Van Buren is disgusting, if they can't afford to repave it,they should stop the big rigs from using it and now they want to add more commercial vehicles to itNo thank you"	Commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[2] No environmental issues are raised; comment noted.
Renee Hill 6/1/2022	"I value my health, neighborhood and environment.If we don't stand now we will loose it to the politicians who chose money over people!!!"	The Draft EIR includes a full analysis of the Project's potential environmental impacts

[2] https://www.dmv.ca.gov/portal/dmv-research-reports/department-of-motor-vehicles-dmv-performance-reports/where-did-your-2020-fees-go/

Commenter Comment Date	Comment	Response
		throughout Chapter 4, Environmental Analysis. Recirculated Section 4.2, Air Quality, includes an analysis of potential health risks.
Denise Stephenson 6/11/2022	"I don't want warehouses built in this area. We have enough of them."	No environmental issues are raised; comment noted.

I-4.15 The responses to comments listed in the attached petition are provided in the table below:

Commenter Comment Date	Comment	Response
Karen Renfro 6/29/2022	"Warehouses are not compatible with residential, parks, schools, libraries, churches, hospitals, nursing homes, community stores, business districts, farming, ranching, fruit orchards, vineyards, flood zones, earthquake zones, etc. They should be built somewhere far away from urban areas and anywhere nature is known to exert itself in ways destructive to man's intrusions. Truck traffic should be banned in residential and commercial areas."	The Draft EIR includes a full analysis of the Project's potential environmental impacts throughout Chapter 4, Environmental Analysis. This includes impacts related to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue.
Harry Knapp 7/13/2022	I am twenty-five years resident of Riverside. I agree with the goal of this petition."	No environmental issues are raised; comment noted.
Karen Kinstley 8/2/2022	"I feel it is wrong to build on land that wildlife use."	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. The Draft EIR evaluates impacts to wildlife in Section 4.3, Biological Resources.

Commenter Comment Date	Comment	Response
April Glatzel 8/4/2022	"I'm signing because Riverside has enough warehouses. More warehouses will contribute to more noise and air pollution, traffic, and the desecration of our open wildlife spaces. Enough is enough already!"	The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. Recirculated Section 4.2, Air Quality, evaluates impacts to air quality, Section 4.3, Biological Resources, evaluates impacts to wildlife and Section 4.11, Noise, evaluates noise impacts. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

I-4.16 The comment contains 2,801 petition signatories who signed the petition between March 29, 2022 and January 8, 2023. Of the 2,801 signatories, 1,547 (55.2%) signatories are located within Riverside County, and 848, or 30.3% are located outside of California. The remaining 406 (14.5%) signatories are located within California yet outside of Riverside County. This comment transmits signatures and does not include any specific issues or concerns regarding the environmental analysis in the Draft EIR; as such, no such, no further response is provided.

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Letter I-5

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From: Jen L <jlarrattsmith@gmail.com>
Sent: Tuesday, January 10, 2023 7:53 AM
To: Dan Fairbanks
Subject: Re: Notice of Availability for a Draft EIR (West Campus Upper Plateau)

Dear Mr. Fairbanks,

Thank you for the notice.

Is there a reason the 2003 Settlement Agreement is not included under the technical appendices but the 2012 agreement is?

I-6.1

Thanks for any clarification you can provide.

Jen

On Mon, Jan 9, 2023 at 6:29 PM Dan Fairbanks <fairbanks@marchjpa.com> wrote:

> Good Evening:
>
> March JPA has posted the West Campus Upper Plateau Draft EIR to the March JPA website. It is available at: https://marchjpa.com/mjpa-meridian-west-campus/
>
> This is a request by Meridian Park LLC for a General Plan Amendment and Specific Plan/Zone Change approval at the former March AFB Weapon Storage Area and adjacent property. The Specific Plan Area is a campus development with a buildout scenario including 10 Business Park parcels totaling 65.32 acres, 6 Mixed Use parcels totaling 42.22 acres, 3 Industrial parcels totaling 143.31 acres, 2 Public Facility parcels totaling 2.84 acres, 3 open space parcels totaling 17.72 acres and public streets totaling 37.91 acres. Plot Plans for Buildings B and C totaling 1,837,000 square feet would be constructed on two of the Industrial Parcels. The remaining parcels would be developed with square footages as allowed under the Specific Plan. A proposed park component of the Project, consisting of 60.28-acres located west of the Barton Street extension, is included under the Specific Plan buildout scenario. Vehicular access at the Cactus Avenue and Barton Street location is prohibited, except emergency vehicles through a Knox box gate. Through a recorded Conservation Easement of approximately 445.43 acres, the undisturbed land surrounding the Specific Plan Area would be preserved in perpetuity. Other applications include a Tentative Parcel Map and a Development Agreement. Further details including a land use plan are identified in the attached project description.
>
> The review period for this document is January 9, 2023 – March 10, 2023 and comments may be sent to the following address/email during the review period.

Dan Fairbanks

Planning Director

March Joint Powers Authority

14205 Meridian Parkway, #140

Riverside, CA 92518

Phone: (951) 656-7000

Fax: (951) 653-5558

Email: fairbanks@marchjpa.com

Letter I-6

Jen Larratt Smith
January 10, 2023

I-6.1 This comment questions the omission of the 2003 Settlement Agreement from the Draft EIR appendices. The 2003 Settlement Agreement with the Center for Community Action and Environmental Justice and Community Alliance for Riverside's Economy & Environment related to the development of the March Business Center, which does not include the Project site. For informational purposes, the Project's consistency with the 2003 Settlement Agreement is included in Topical Response 4 - Project Consistency. This comment does not include any specific issues or concerns regarding the environmental analysis in the Draft EIR; as such, no such, no further response is provided.

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From: Cindy Camargo <camargo@marchjpa.com>
Sent: Wednesday, January 11, 2023 8:06 AM
To: Dan Fairbanks
Subject: FW: March JPA - West Campus Upper Plateau Comment Submit

Good morning Dan, please see below.
Thank you,

Cindy Camargo, CAP
Executive Assistant & Notary Public
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
951-656-7000 [Office]
951-288-3548 [Cell]
March JPA – FTZ #244 Grantee
camargo@marchjpa.com
www.marchjpa.com
www.marchinlandport.ca

From: MJPA West Campus <mjpawestcampus@marchjpa.com>
Sent: Tuesday, January 10, 2023 6:43 PM
To: Mike McCarthy <uber.snotling@gmail.com>
Subject: RE: March JPA - West Campus Upper Plateau Comment Submit

Greetings,

Thank you for your comment to the West Campus Upper Plateau Draft Environmental Impact Report (DEIR). Please note that the correct email address for comments is mjpawestcampus@marchjpa.com. This email is to acknowledge receipt of your comments to the DEIR. Responses to comments will be conducted in a manner consistent with the March JPA's Local CEQA Guidelines. As such, your comment has been submitted for inclusion within the appropriate CEQA process.

Sincerely yours,

March Joint Powers Authority
www.marchjpa.com

From: chris@dtsconnect.com <chris@dtsconnect.com> **On Behalf Of** mjpawestmarch@marchjpa.com
Sent: Monday, January 9, 2023 9:18 PM
To: mjpawestmarch@marchjpa.com; Info <info@marchjpa.com>; info@marchjpa.org
Subject: March JPA - West Campus Upper Plateau Comment Submit

Name: Mike McCarthy
Email: uber.snotling@gmail.com
Message: Dear March JPA planner,

The map displayed on the https://marchjpa.com/mjpa-meridian-west-campus/ web site is incorrect and inconsistent with the Draft EIR map Figure 3-5. Given that this is the landing page of the project, this is misleading the public and liable to lead to confusion. This is especially aggravating because it is extremely likely the Figure 3-5 map has been available for months and not been displayed to the public. Due to your error, I request that the March JPA fix the map and post an errata beneath the map indicating that it has been misleading the public about the current project map for an unspecified amount of time. The March JPA continues to put forth misleading communication about this project and intentionally obfuscate the true details of the project to the public. I-7.1

Sincerely,
Mike McCarthy
Riverside Neighbors Opposing Warehouses

Letter I-7

Mike McCarthy
January 9, 2023

I-7.1 This comment notes that the Project site plan originally displayed on the March JPA website is incorrect and inconsistent with Figure 3-5 in the Draft EIR. In response to this comment, the figure of the site plan on the website was replaced to be consistent with Figure 3-5 of the Draft EIR. This comment does not include any specific issues or concerns regarding the environmental analysis in the Draft EIR; as such, no such, no further response is provided.

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From: Mike McCarthy <uber.snotling@gmail.com>
Sent: Tuesday, January 10, 2023 5:33 PM
To: Dan Fairbanks; Jennifer Larratt-Smith; Jerry Shearer
Subject: errors and omissions on the Draft EIR

Dear Mr. Fairbanks,

In my initial review of the draft EIR, I've noticed a number of errors and missing figures that are detrimental to the accuracy of the report. I'm hoping these can be rapidly corrected or additional time can be added to the review period due to the applicant's errors and omissions in submitting their draft EIR. I-8.1

- Figure 3-6 - proposed truck routes - colored orange and red routes do not align with roads on map - which are correct? Additionally, business park and mixed-use parcels are not consistent with Figure 3-5. I-8.2



- Figure 3-7E, G, & H - electrical, cable, gas backbone - parcel map for business park parcels on the north is inconsistent with Figure 3-5 so connections are not shown for individual parcel not connected to I-8.3
- Figure 4-1 - described as map of Cumulative Effects projects - not included in draft EIR I-8.4
- Figure 4.11-9 Inconsistent map with Figure 3-5, park does not match current park footprint, parcels inconsistent for north business park and west mixed-use I-8.5
- Figure 6-1 - described as Reduced development alternative 2 - does not appear to reduce the north business park footprint at all - looks like it just increased the parcel size and decreased the number of parcels to the plan posted on the website. I-8.6

There were also omissions and errors in the appendices, but I'll send those in a separate comment letter.

Sincerely,
Mike McCarthy
Riverside Neighbors Opposing Warehouses

Letter I-8

Mike McCarthy
January 10, 2023

I-8.1 This comment generally states the identification of errors and omissions in the Draft EIR and requests the Draft EIR public comment period be extended. As stated in the responses below, these errors and omissions are minor and do not result in material changes to the environmental analysis in the Draft EIR.

I-8.2 This comment states that Figure 3-6, Proposed Truck Routes, does not reflect the Project site plan in Figure 3-5 and the truck route lines do not align with roadways. These corrections have been incorporated into a revised Figure 3-6 included in the Recirculated Chapter 3, Project Description, and Final EIR. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

I-8.3 This comment states that Figures 3-7E, G and H do not reflect the Project site plan in Figure 3-5. The Project site plan in Figure 3-5 has been incorporated into revised Figures 3-7A, 3-7C, 3-7E, 3-7F, 3-7G and 3-7H in the Recirculated Chapter 3, Project Description, and Final EIR. These revisions do not constitute 'new information' under CEQA and do not impact the environmental analysis in the Draft EIR.

I-8.4 This comment notes that Figure 4-1, Cumulative Development Location Map, is missing from the Draft EIR. This figure was included in Appendix N of the Draft EIR (Exhibit 8) and has been added to the Final EIR. This does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

I-8.5 This comment states that Figure 4.11-9, Operational Noise Source Locations, does not fully reflect the Project site plan in Figure 3-5. The Project site plan in Figure 3-5 has been incorporated into revised Figure 4.11-9 in the Final EIR. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

I-8.6 This comment states that Figure 6-1, Alternative 2 – Reduced Development Area Alternative, does not reflect Alternative 2's land uses. The revised Figure 6-1 is included in the Final EIR. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

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From: MJPA West Campus <mjpawestcampus@marchjpa.com>
Sent: Tuesday, January 10, 2023 6:50 PM
To: Dan Fairbanks
Cc: Cindy Camargo
Subject: Fw: March JPA - West Campus Upper Plateau Comment Submit

FYI. Standard response below being sent out from the West March Campus email. Thank you.

From: MJPA West Campus <mjpawestcampus@marchjpa.com>
Sent: Tuesday, January 10, 2023 6:49 PM
To: robertdoty32@aol.com <robertdoty32@aol.com>
Subject: Re: March JPA - West Campus Upper Plateau Comment Submit

Greetings,

Please note that the correct email address for comments is mjpawestcampus@marchjpa.com. This email is to acknowledge receipt of your comments to the West Campus Upper Plateau Draft Environmental Impact Report. Responses to comments will be conducted in a manner consistent with the March JPA's Local CEQA Guidelines. As such, your comment has been submitted for inclusion within the appropriate CEQA process.

Sincerely yours,
March Joint Powers Authority
www.marchjpa.com

From: chris@dtsconnect.com <chris@dtsconnect.com> on behalf of mjpawestmarch@marchjpa.com <mjpawestmarch@marchjpa.com>
Sent: Tuesday, January 10, 2023 7:24 AM
To: mjpawestmarch@marchjpa.com <mjpawestmarch@marchjpa.com>; Info <info@marchjpa.com>; info@marchjpa.org <info@marchjpa.org>
Subject: March JPA - West Campus Upper Plateau Comment Submit

Name: Robert Walker
Email: robertdoty32@aol.com
Message: You are a corrupt organization working for the developers not the interest of people living in the neighborhood. This is. Nothing more than economic racism over use of tax payer land and monies. I am filing an EEO complaint and with The department of Justice for corruption. You are taking away from our community a jewel enjoyed by many to simply degrade our quality of life. Honestly I wish the same degrading upon your community and family so you can share the lower quality life we are dealing with due to your vision of Orangecrest. Our families count whether you care or not. Shame on you.

I-9.1

Letter I-9

Robert Walker
January 10, 2023

I-9.1 This comment expresses opposition to the proposed Project and does not raise comments or concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

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From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Saturday, January 14, 2023 1:28 PM
To: Dan Fairbanks
Subject: Public Comment, draft EIR West Campus Upper Plateau

Hello Dan,

I believed that my remarks to the Commission on January 11th would be reflected in the draft EIR, but since it was clear that they would not be included, I thought I would email you the text from my short speech as a record of it related to the EIR. Thank you for your time and help. I-10.1

Jerry Shearer
92508

Hello, my name is Jerry Shearer. I live in the Orangecrest neighborhood of Riverside, and I am a member of Riverside Neighbors Opposing Warehouses.

I am here tonight to comment on the draft Environmental Impact Report for the Meridian West Campus Upper Plateau project. I am opposed to the plan to build industrial warehouses on the West Campus Upper Plateau and am especially disappointed that this commission did not hold JPA employees and the builder accountable for genuinely engaging with the public during the prolonged preparation of this plan. I-10.2

For 10 months, I have personally spoken to and consistently emailed you asking that you compel the JPA and builder to consider the health and welfare, the quality of life and the dreams of, and the economic reason for creating a land use plan that benefits the communities directly impacted by the development of this land.

While I am a shameless proponent of "leave it as it is" thinking, the reasons to do so are deeply meaningful for all who live in this part of Riverside County, our community understand that development of this land

may be inevitable due to the greed and avarice of developers like the Lewis Group.

I-10.2 Cont.

Thus, it is inconceivable to the public why the JPA and Lewis Group did not offer an alternative plan for developing this land, one that addresses clear and present messaging from the community: no more warehouses. Instead, we get 4 plans that include up to 4,986,650 square feet of industrial warehouse space within 300-800 feet of Riverside residences. How are any of these plans addressing the explicit and persistent concerns of the community? No more warehouses!

Build baseball, soccer, or football fields. Build interactive nature trails. Build solar or wind farms. Build auto repair shops or commercial shops and restaurants. Build single family homes. Build a true mixed-use complex that allows residents to enjoy the land and the developer to build and profit from the project. Build something that gives back to the environment as much as it extracts from it. None of this will happen unless you the commission demands it and since we are here tonight at this point in the process it seems like you are not holding the JPA accountable.

I-10.3

Representatives from Riverside, will you stand up for your residents? Perris? Moreno Valley? How will you protect the people you were elected to serve? Our county supervisors, how will you mitigate the unrestrained logistics sprawl over-running the western part of your jurisdiction?

If it isn't too late, please take action tonight to convene a community advisory group (I'd volunteer for it) and involve them in these vital land-use decisions. I also ask that you compel the JPA and builder to reconsider this faulty draft EIR and send them back to develop alternate plans that do not include warehouses and address the real concerns of the community who will have to live with this development on a daily basis. Thank you and good night.

I-10.4

Letter I-10

Jerry Shearer Jr.
January 14, 2023

I-10.1 This comment questions whether or not public comments raised at the January 11, 2023, March JPA Commission meeting will be included in the Final EIR. Responses to comments from the January 11, 2023, Commission meeting are provided in Section 6, Public Meeting Responses to Comments, within this volume of the Final EIR.

I-10.2 This comment conveys general opposition to the Project and questions the extent of public engagement. The March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three workshops, and one Zoom virtual meeting with a public notification radius of 1.200 feet around the perimeter of the Project site resulting in 2,172 public notices. This comment does not raise comments or concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-10.3 This comment requests the inclusion of a non-industrial alternative. Please see Topical Response 8 – Alternatives, for the analysis and evaluation of Alternative 5, Non-Industrial Alternative. This comment also requests the inclusion of recreational facilities and open space. The proposed Project, as well as all alternative to the Project, includes the proposed Park with recreational amenities and open space with trails along with the 445.43-acre Conservation Easement with existing trails for passive recreational use.

I-10.4 This comment requests a community advisory group and a non-industrial alternative. See Response I-10.2, above, regarding community engagement. Creation of an advisory group is outside the scope of CEQA. See Topical Response 8 – Alternatives, for the analysis and evaluation of Alternative 5, Non-Industrial Alternative.

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From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Monday, January 30, 2023 4:24 PM
To: Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; edd@moval.org; district5@rivco.org; Mayor@moval.org
Cc: Jen L.; Dr. Grace Martin; Michael McCarthy; Dan Fairbanks; Gabriela Mendez
Subject: Warehouse issues

Good afternoon,

I am emailing all of you today to share an experience related to March JPA warehouses. This morning at 3:53 AM, I was awakened by the repeated "beep, beep, beep" sound of logistics sprawl invading my sleep. The sound of a diesel truck backing up before 4:00 AM, so loud that I could hear it over the sound of my heater, over the sound of rain falling on my alumawood patio cover, and through my closed and shuttered windows; it was enough to end my sleep for the night. I-11.1

I'd like to say this is a one-off, poor planning and decision-making by a lone driver, but it isn't. This noise pollution is a frequent occurrence in my neighborhood. Some nights (when most people sleep) it is the noise of a truck backing up, some times it is the sound of a large door being slammed closed, some times it is people talking loudly to be heard over the sound of logistics and "e-commerce". I-11.2 And if it isn't noise pollution causing me (and my neighbors) distress, then it certainly is the light pollution which has forced me to plant (at additional personal cost) along my back yard to help mitigate the increased lights from warehouses, trucks, and cars shining into my bedroom. And if it isn't noise or light pollution then it is the smell of diesel exhaust from idling trucks carried by easterly winds blowing in hot from the desert carrying their toxic fumes right into my window as my family and neighbors sleep. Am I exaggerating? Is there truth in my words today? OrangeCrest residents, my neighbors, have noticed a significant uptick in truck and warehouse related pollution directly impacting our lives. The sound of jobs, right? More like the sound of a government that doesn't seem to care. I-11.3

When many of us bought our homes, especially those bordering the open space along Meridian Pkwy, we were shown JPA maps that clearly identify this area as Stephens Kangaroo Rat habitat not to be developed, especially not warehouses. When the JPA worked out an agreement to develop this land, and residents sparingly commented on their projects, we were told that mitigations would be put into place to lessen the impact of this industrial intrusion on our lives. I am not convinced this has really happened, or if measures have been taken, they are ineffective. "Beep, beep, beep." It is a permanent part of my psyche. I-11.4

With the release of the West Campus Upper Plateau EIR, you know all too well that the communities of western Riverside County oppose heavy logistics and more industrial blight in this area. We are disproportionately impacted already. The JPA and its developer claim they have mitigated the impact on human life on this project much in the same way they claimed to for the existing warehouses that negatively impact my and my neighbors lives each week. There is a misconception that the community emailing you or speaking out is really just a vocal few. Please understand that with ample evidence based on real world experiences of being a neighbor to the JPA and its developments, whole communities are impacted by their poor land use planning, and even more so by their lack of accountability, and we are fed up. I-11.5

I have emailed and spoken many times to members of the JPA regarding the negative impacts (noise, light, air pollution that cause real health issues) that are causing people to resent the JPA and their warehouses, but I usually don't get any help or answers. I know the warehouses that are built will not go away and that the only sounds that will wake future me up at night won't be coyotes and the occasional grazing sheep to help with weed abatement. I want to share this experience with you so that you consider the real impacts on the community when the JPA and its developer say they are mitigating impacts. The community is having a difficult time understanding why no one is accountable for this pollution or for the broken laws and promises when they happen. Once again I email asking for help holding the tenants of these warehouses, the building owners, and the permitting agency accountable for the damage they are doing to the lives of the resident forced to live with this scourge. I also email you once again to add to the record that I am asking the JPA to address these issues with existing tenants and show that they care about the lives of its neighbors. Please be considerate of our community and demonstrate you are a good neighbor moving forward.

I-11.6

Thank you for your time today.

Jerry Shearer
92508

Letter I-11

Jerry Shearer Jr.
January 30, 2023

I-11.1 This comment raises concerns about existing sources of nighttime noise from warehouse development within the March JPA planning area. These are existing sources of noise and are not associated with the proposed Project. The Draft EIR analyzed the nighttime noise sources identified by the commenter for the proposed Project and determined impacts would be less than significant. As shown in Table 4.11-1, 24-Hour Ambient Noise Level Measurement Results, of the Draft EIR, nighttime (10:00 pm to 7:00 am) ambient noise levels at locations surrounding the Project site range from 43.9 dBA L_{eq} to 56.6 dBA L_{eq}. Table 4.11-7 summarizes the significance thresholds for operations near noise-sensitive receivers. Under the Specific Plan buildout scenario, the Draft EIR evaluated nighttime noise sources from Project activities, including loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements and truck movements. These sources include the noise sources identified by the commenter, such as back-up alarms, people talking, and doors being closed. As shown in Tables 4.11-27 and 4.11-29, the Project will not exceed the nighttime noise thresholds at any receiver location. However, the Project would result in one significant and unavoidable operational noise impact along Cactus Avenue east of Meridian Parkway due to increases in traffic along this non-sensitive street segment adjacent to industrial buildings.

Under Table 3-2, Development Standards, and Section 4.4.2, Truck Courts and Loading Docks, of the proposed Specific Plan, truck courts and loading docks must be oriented away, or screened from surrounding residential land uses, which will reduce noise impacts through attenuation. Section 4.4.1, Walls and Fences, of the proposed Specific Plan requires screen walls around the perimeters of individual building sites, loading and dock areas, trailer parking areas, and parking lots, further attenuating Project noise sources. The Project is subject to the March JPA Development Code Section 9.10.140, which states "any loudspeaker, bells, gongs, buzzers, or other noise attention or attracting devices shall not exceed 55 dBA at any one time beyond the boundaries of the property. Sounds emitting from any of the aforementioned devices, including or live or recorded music, shall cease between the hours of 10:00 p.m. and 7:00 a.m. if the sound therefrom creates a noise disturbance across the property line of a residential use." Section 3.5.4 Off-Street Loading Facilities, of the Specific Plan also includes this restriction. Additionally, the Project includes the Conservation Area, which would serve as a buffer between the Project and residences. Project nighttime noise impacts would be less than significant.

I-11.2 This comment expresses concerns about lighting and lighting impacts upon residential uses. The comment cites existing light intrusion impacts from nearby existing uses and does not specifically relate to this Project. Lighting impacts associated with the proposed Project are evaluated in Section 4.1, Aesthetics, of the Draft EIR. PDF-AES-2 through PDF-AES-16 identify project design features included as part of the proposed Specific Plan that address lighting and light spillover. Prior to the issuance of any building permit, MM-AES-2 requires an exterior point-by-point photometric study demonstrating compliance with these PDFs, the March JPA Development Code and the Specific Plan. For example, PDF-AES-2 requires minimization of glare and spillover light onto public streets, adjacent properties, and the Conservation Easement by using downward-directed lights and/or cutoff devices on outdoor lighting fixtures. PDF-AES-3 limits light spillover to one-half foot candle or less for property adjacent to the Conservation Easement as confirmed through a point-by-point photometric study. As distance

increases, light intensity decreases so residences abutting the Conservation Easement would experience negligible light spillover. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. With implementation of PDF-AES-2 through PDF-AES-16 and MM-AES-2, light spillover impacts would be less than significant.

I-11.3 This comment raises health concerns about truck emissions for nearby residents, and specifically diesel exhaust. For the proposed Project, a Revised Health Risk Assessment Technical Report (Appendix C-2) was prepared to evaluate the potential health-related effects from diesel emissions associated Project construction and operation. As discussed in Recirculated Section 4.2, Air Quality, the land use with the greatest potential exposure to Specific Plan Area construction-source DPM emissions is Location R11, which is located approximately 304 feet north of the mixed-use portion of the Specific Plan Area at an existing residence located at 971 Saltcoats Drive. R11 is placed in the private outdoor living areas (backyard) facing the Specific Plan Area. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0. As such, the Specific Plan Area would not cause a significant human health or cancer risk to adjacent land uses as a result of construction activity. All other receptors during construction activity would experience less risk than what is identified for this location. Nonetheless, implementation of MM-AQ-1, which requires the use of Tier 4 Final construction equipment, would further reduce impacts to sensitive receptors.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Specific Plan Area than the MEIR

analyzed herein, and TACs generally dissipates with distance from the source, all other residential receptors in the vicinity of the Specific Plan Area would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Specific Plan would not cause a significant human health or cancer risk to nearby residences as a result of operational activity.

I-11.4 This comment states the Project site was identified as habitat for Stephens Kangaroo Rat (SKR) and not to be developed. As discussed in Recirculated Section 4.10, Land Use and Planning, since the development of the March JPA General Plan in 1999, the Project site has been designated for development. Although Exhibit 5-1 of the March JPA General Plan identifies the former Weapons Storage Area as SKR Open Space and the remainder of the Project site as SKR Management Area, the General Plan explains the intent to purchase better quality SKR habitat elsewhere so that "the lands currently designated for SKR management and open space purposes will be available for development." Figure 1-4, Land Use Plan, of the March JPA General Plan designates the former Weapons Storage Area as Park/Recreation/Open Space and the remainder of the Project site as Business Park. The swap of March JPA lands, including the Project site, for more and better quality SKR habitat was the subject of the 2012 Settlement Agreement with the Center for Biological Diversity and San Bernardino Valley Audubon Society (Appendix S). Under the CBD Settlement Agreement, the land uses were inverted, with the Weapons Storage Area identified for development, along with a 60-acre park, and the remainder of the Project site identified as a conservation easement (see Figure 3-4 of the Draft EIR). The Project's potential direct and indirect impacts to SKR and its habitat are evaluated within Section 4.3, Biological Resources, of the Draft EIR. With implementation of MM-BIO-1 (Best Management Practices), MM-BIO-3 (Operation-Related Indirect Impacts to Special-Status Wildlife), and MM-BIO-4 (Stephens' Kangaroo Rat Avoidance and Mitigation), the Project's direct and indirect impacts to SKR and its habitat would be less than significant.

I-11.5 This comment conveys general opposition to the Project and does not raise comments or concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-11.6 This comment conveys general opposition to the Project, raises concerns about existing development separate from the proposed Project, and does not raise comments or concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

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February 5, 2023

Hello JPA Commissioners,

I want to thank all of you that have engaged with the public regarding the Meridian West Campus Upper Plateau project. You have kindly held meetings with us, received many emails from us, and attended public events to hear us talk about this project over the last 11 months. But the time has come for all to focus on the draft EIR released earlier this month as we head to the March 10th deadline for public comment.

While it does make some sense to maintain communication with you during this legally binding comment period, I am confident that you all recognize at this point the public's overwhelming and unified opposition to more warehouses, especially on this land. I don't take your obligation as a commissioner lightly and neither should you. For 11 months, since first learning of this project, thousands of community members from all over western Riverside County have come together to try to comprehend the reason for putting mega-warehouses on this extremely unique piece of land. During this time, one answer seems to prevail: money, more specifically one company's sense of entitlement to take every last dollar out of this land while it can. I-12.1

My objective here is to summarize where we are regarding the West Campus Upper Plateau project right now, and to implore you and the JPA to engage authentically with the public working cooperatively to find a better plan that addresses the interests and concerns of all who are involved with or impacted by this project. The posting of the February 8th JPA Commission meeting agenda has me concerned that the developer is forcing through a purchase of the land at the West Campus Upper Plateau prior to the completion of an active EIR review. The legalities are fuzzy to me, but that aside, this ongoing push to privatize public land and ignore public involvement goes against everything the JPA is tasked with doing under the General Plan. The action proposed under the agenda for the February 8th meeting seems premature pending the completion of the EIR process; it appears pre-decisional by the builder, and appears to not aligned with the JPA's CEQA process. I am not sure what you as commissioners can or will do on Wednesday when agenda item 8-11 comes up for discussion, but voting in favor of it sends a negative signal to the public who are diligently working to follow the legal process by commenting on the draft EIR. I implore you, before you discuss and vote in chambers, read the rest of my email below, especially #5. I-12.2

If you will grant me a bit of your time again, I'd like to review a few things (a top 5 of sorts) about this project with you one last time, and then off to deal with that enormous document.

1. The West Campus Upper Plateau is a unique piece of land. It is an extension of the Sycamore Canyon Park natural area geographically, historically, culturally, environmentally, and recreationally. There is no other place like it in western Riverside County. Any development of this land should complement the unique characteristics and I-12.3

value (human value, not just economic value) of this land not destroy it. As much as the developer's EIR tries, this industrial development plan and land use zoning do not preserve the landscape even with the inclusion of the 2012 agreement that sets aside open space and a conservation easement. If you would have spent an hour with me on the trails as I have requested for 11 months, you may have seen this for yourself. Viewing this land from a map or a parking lot don't begin to do its human value adequate justice. The public wants to understand your thoughts on taking this special piece of land away from residents of western Riverside County and turning it over for private development. The establishment of the 2012 settlement does not adequately reflect how people value and enjoy this land currently. This warehouse project is not like other warehouse projects and it will have a significant negative impact on the community it borders regardless of the developer's mitigation efforts and claims.

I-12.3 Cont.

2. On page 860/916 of the electronic draft EIR, the JPA and developer address alternatives to the project that were rejected. The first reason listed (6.3.1) is that there is no alternate site for this project (because of its size). This explanation implies that this project (a mega-warehouse complex) is pre-decisional, the realization of a legal entitlement for the developer to build warehouses anywhere it wishes. It implies that because the developer wants mega-warehouses to lease or sell to whomever (foreign or domestic) it wants that it is their right to repurpose public land for private gain. It implies that the decision to build only warehouses here was made long ago and by approving their plans the JPA and this commission are helping to privatize public lands in a way that damages the public interest and our infrastructure but benefits the developer financially. There is absolutely no community sentiment for building warehouses here (nor is there a need for the few temporary, low paying jobs created by these eyesores), but there is wide ranging public support for development that improves our lives and community. The developer does not prioritize the values of the community, the protection of its citizens, or the collaboration with communities impacted by this project. They have a history of sanctioned negligence and their lack of accountability and accuracy is even written in the EIR you are considering today. As our representatives on this commission, we expect you and the JPA to hold the developer accountable for our lives as much as you allow them to profit from this project. What lengths have you taken to do this? How will you hold them accountable on our behalf? How will you enforce the JPA's own mission identified in the General Plan, the one that protects community values, health, and history from narrowly focused and neglectful land use decisions? The economic risk here is massive; as quickly as the economy moved to demand more storage space, it will in all likelihood swing back and once built that space will sit as an empty concrete monument to bad government decisions and capitalism at its worst.

I-12.4

I-12.5

3. At three meetings with the developer prior to the release of the draft EIR, I joined with members of the community to demand an alternative plan that did not involve warehouses. Instead, we got a plan that brings up to 4.9 million square feet of industrial

I-12.6

buildings to the West Campus Upper Plateau (it's foolish to believe that this space will be used for anything but logistics, this is happening with existing JPA developments today. The Meridian logistics center is not the Amazon warehouse type where goods are received and shipped to local customers, most of these warehouses are long-term storage centers taking advantage of the JPA's Free Trade Zone 244). Instead of diverse land use options, we got three alternate plans that modify this main plan slightly, essentially, we still only have one plan, and one plan that does nothing with the land (more on this one in item 5 below). The four all industrial/business/mixed use building plans ignore the repeated message of thousands of residents from Moreno Valley, Perris, Riverside, and unincorporated Riverside County. These plans also ignore the overwhelming evidence that the cumulative effects of logistics sprawl along the 60/215 corridor is making western Riverside County an undesirable place to live (in fact there is no traffic study of this interchange in the draft EIR). Despite the JPA's insistence that during the August open house many residents offered insightful help to improve the project, we collected 54 signatures that night opposing the project as presented at the gathering and zero signatures supporting it. Again, the unified plea of "no more warehouses" was ever present and the demand by the community for a plan that excluded warehouses was ignored by the JPA and developer once again. The public expects the JPA to honor its commitment (page "v" of the General Plan) to serve as a link between community values and physical (land use) decisions. Is this line guidance or a mission statement? After 11 months of communication with the JPA, why is there no option to develop this land in a way that reflects community values and input? As members of the commission, you must hold the developer and the JPA accountable to this mission. The JPA and the developer should be required to offer a plan that considers community minded development of the Upper Plateau because they have failed to consider the public or the mission of the JPA with this EIR. Anything less implies a pre-decisional nature of the developer to put its profit before anything that the community wants with this public land. Please hold them accountable. We are relying on you.

I-12.6 Cont.

I-12.7

I-12.8

4. Publicly, the JPA consistently points to language in the General Plan and the March JPA website that states the primary justification for this sprawling industrial project is their duty to develop and repurpose March ARB lands and to bring jobs to the area. The JPA has documented that it has already replaced the jobs lost by the realignment of the base in 1993, Dr. Martin proudly stated this in front of the Riverside City Council in October. These jobs numbers are readily available to you now. The draft EIR references in many places that 2,600 jobs would be created at the peak of operations resulting from this project, but later this document admits that the jobs would not result in long-term employment growth for the region (section 4.7.32), and public data suggest that this number is also inaccurate. The unemployment rate in this area is between 3.3-3.7% and the and the average household income is $103,513. There is no need for a giant concrete campus that will not impact the jobs numbers for this area, nor would those jobs pay the kind of wage that would allow people to live in this area. The EIR contains some mixed

I-12.9

I-12.10

messaging (at best) on jobs for sure, but the end result is this is not an overwhelming driving reason to build warehouses on the Upper Plateau. This argument by the JPA and developer is misleading and is not supported by data on your local agency websites. Please explain how the low quality and temporary jobs this project would provide will employ residents (as stated multiple times by the draft EIR). Western Riverside County cries out for jobs that can support the cost of living in this region and warehouse jobs cannot do this. How is this a primary reason to approve this project? If job creation is a primary driving factor for this project, why hasn't the developer and the JPA created a land use plan that focuses on jobs for residents of western Riverside County? There must be a better use for this special piece of land, one that the Air Force, residents and visitors, local municipalities, lawyers and lawmakers, and the JPA can all support.

I-12.10 Cont.

5. The project objectives identified in section 6.2 of the draft EIR lays out how this plan would amend the overall March JPA General Plan just as every specific plan has done over the years. You can read these objectives on page 859/916 of the PDF for yourself. In this plan, Alternate Plan 1 under consideration is titled "No Project" and under section 6.4.2 the explanation of this plan appears to be a mandated option in the EIR, primarily for comparison purposes with the main plan and the other three alternate plans. This plan can be easily dismissed as naïve and misguided, and more than once I have been accused of being the loudest of the unreasonable proponents of this alternative. But there is another solution wherein Alternate Plan 1 is reasonable, popular, and financially realistic, and that plan is to make it a cultural and historic local or state park via the National Parks Service's BRAC program. I have investigated this idea and have a contact with the NPS who recommended that this would fit the NPS BRAC model but that the JPA would need to work with the US Air Force to reassign land ownership rights. Without going into more details here, I am happy to work with you to investigate this real alternative plan that does exactly what the public is asking by preserving the open space and greenbelt, protecting the natural landscape and sensitive habitats (see Appendix S and the 2012 agreement), preserving a quality of life in western Riverside County, and allowing the public to enjoy this special piece of land forever. It would also allow us to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County. Will you help encourage this truly groundbreaking, forward-thinking alternative for the West Campus Upper Plateau? This option will take courage but you would have 100% support from the public and the Air Force for it.

I-12.11

The community has asked the JPA for an alternative to more warehouses, more traffic, more pollution, more crime, and more anxiety associated with these buildings. We have asked the JPA to use this land to enhance our lives (remember unemployment is at historically low levels right now) instead of privatizing yet more public land. These warehouses only benefit the developer. I will have more to say during public comment of the EIR but it is important that you hear just how much people care about this land. I spoke to a family of 6 today who were enjoying the very

I-12.12

trails that will soon be an intersection for semitrucks if this plan is approved. They could not understand why anyone would allow this plan to go forward, and frankly neither do I. I-12.12 Cont.

Again, thank you for your time and consideration of my requests over the last 11 months. I know the job you have is not trivial and that you are giving it considerable attention. I trust that you will remember the significance of your decisions as you serve on this commission. You are, by process of elimination, the only ones that can hold the JPA and its exclusive contractor the Lewis Group accountable to the public. You are the ones who must honor the JPA's mission as written by the original authors of the General Plan and provide the basis for local government decision-making serving as the conduit between the public and any land use decisions that impact us. Approving more warehouses on the West Campus Upper Plateau is a vote for the continued privatization of public lands and interests. A vote in favor of this plan (and in favor of agenda item 8-11 on February 8th) unfairly gives the developer more power in our representative democratic government than citizens have. Approving any of these plans is a vote against those people that you represent and a vote for one man and his private business. I-12.13 I-12.14

I hate to end on a somber note so I will once again say I appreciate your consideration of my ideas and words today, and I once again invite all of you to join me on the trails throughout this special place so that you might see just how unique this landscape is to western Riverside County, speak with people and understand just what a value it is to our community, and hopefully start to understand how nature and undisturbed open-space improves our lives much more than capitalism. I-12.15

Respectfully,

Jerry Shearer
92508

Letter I-12

Jerry Shearer Jr.
February 5, 2023

I-12.1 This comment conveys general opposition to the Project and does not raise comments or concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-12.2 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

I-12.3 This comment describes the commenter's personal opinion of the Project site. The comment does not raise comments or concerns regarding the adequacy of the environmental analysis in the Draft EIR. The comment references the CBD Settlement Agreement, and as such, for more details about how the Project relates to the CBD Settlement Agreement, please see Topical Response 4 – Project Consistency.

I-12.4 This comment raises concerns regarding the Draft EIR's analysis of alternative sites and the lack of a non-warehouse alternative. "Although CEQA requires that an EIR identify alternatives to a project, it does not expressly require a discussion of alternative project locations. ([Pub. Res. Code] §§ 21001, subd. (g), 21002.1, subd. (a), 21061.) The CEQA Guidelines require a description of 'a range of reasonable alternatives to the project, or to the location of the project,' implying that an agency may evaluate on-site alternatives, off-site alternatives, or both. (CEQA Guidelines, § 15126.6, subd. (a).)" *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 491. Chapter 6, Alternatives, of the Draft EIR considered and dismissed an alternate site. In response to the remainder of this comment, please see Topical Response 8 – Alternatives, for the analysis and evaluation of Alternative 5, Non-Industrial Alternative. The comment also describes the Project site as 'public land.' The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant.

I-12.5 This comment conveys general opposition to the Project. The comment does not raise any comments or concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-12.6 This comment notes that all Project Alternatives considered in the Draft EIR include warehouses. In response to this comment, please see Topical Response 8 – Alternatives, for the analysis and evaluation of Alternative 5, Non-Industrial Alternative. The comment incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

I-12.7 This comment objects to the alternatives evaluated in the Draft EIR and states that the traffic study does not include the 60/215 interchange. In response to this comment, please see Topical Response 8 – Alternatives, for the analysis and evaluation of Alternative 5, Non-Industrial Alternative. Additionally, please see Form Letter G Response, for a discussion about the 60/215 interchange.

I-12.8 This comment requests consideration of an alternative without warehousing. In response to this comment, please see Topical Response 8 – Alternatives, for the analysis and evaluation of Alternative 5, Non-Industrial Alternative.

I-12.9 This comment states that March JPA has documented that it has already replaced the jobs lost by the realignment of the base. The comment does not raise any comments or concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-12.10 This comment raises questions about Project job generation and unemployment rates. In response to this comment, please see Topical Response 5 – Jobs.

I-12.11 This comment discusses a potential Project Alternative with the National Park Services' Base Realignment and Closure Act program. The comment also describes the Project site as 'public land.' The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant. In response to this comment, please see Topical Response 8 – Alternatives, which considers a park alternative.

I-12.12 This comment asks why the JPA has not considered an alternative to more warehouses. In response to this comment, please see Topical Response 8 – Alternatives, for the analysis and evaluation of Alternative 5, Non-Industrial Alternative. The comment also describes the Project site as 'public land.' The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant. The comment further raises concerns regarding the loss of recreational open space. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

I-12.13 This comment expresses general opposition to the Project and does not raise comments or concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-12.14 This comment raises questions related to the West March Development and Disposition Agreement. In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement. The comment also describes the Project site as 'public land.' The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant.

I-12.15 This comment is concluding remarks to the letter and does not raise comments or concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

From: Mary Viafora <mlviafora@gmail.com>
Sent: Monday, February 6, 2023 11:08 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

This email is meant as both public comment for Agenda Item 8(11) and a comment for the West Campus Upper Plateau Draft EIR.

I respectfully request that you PLEASE abstain from voting to partially assign the West Campus Upper Plateau to Meridian West, LLC - Agenda Item 8(11) on the February 8 agenda. The public comment period for the DEIR is ongoing, and the March JPA has not completed the CEQA process. It appears pre-decisional to vote on partial assignment of the DDA before comments have been heard, especially when terms of the agreement include "pouring concrete" and having "building inspections" before any buildings have been approved. Why vote before the CEQA process is complete? Approval of this action item makes it more difficult for Commission members to consider alternatives and communicates to the public that you are proceeding without seriously considering the community's concerns.

On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that you do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond.

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust! R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-13.1

Thank you!

Sincerely,

Mary Viafora
Orangecrest 92508

Sent from my iPhone

Letter I-13

Mary Viafora
February 6, 2023

I-13.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Fernando sosa jr. <sosa1977@gmail.com>
Sent: Monday, February 6, 2023 10:04 PM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
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I-14.1

Thank you!

Sincerely,

Fernando Sosa Jr . Orange crest 92508

Letter I-14

Fernando Sosa Jr.
February 6, 2023

I-14.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: D Divani <soheildivani@gmail.com>
Sent: Monday, February 6, 2023 10:05 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-15.1

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Thank you!

Sincerely,

David Divani
Zip: 92508

Letter I-15

David Divani
February 6, 2023

I-15.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Christian Craddock <christian.craddock78@gmail.com>
Sent: Monday, February 6, 2023 11:30 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-16.1

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Thank you!

Sincerely,

Christian Craddock
92508

Letter I-16

Christian Craddock
February 6, 2023

I-16.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: nora jones <jnora893@gmail.com>
Sent: Monday, February 6, 2023 10:00 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-17.1

Thank you!

Sincerely,

Victoria Belova, 92508

Sent from my iPhone

Letter I-17

Victoria Belova
February 6, 2023

I-17.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Sue Nipper <markel221@gmail.com>
Sent: Monday, February 6, 2023 9:44 PM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

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I respectfully request that you abstain from voting to partially assign the West Campus Upper Plateau to Meridian West, LLC - Agenda Item 8(11) on the February 8 agenda. The public comment period for the DEIR is ongoing, and the March JPA has not completed the CEQA process. It appears pre-decisional to vote on partial assignment of the DDA before comments have been heard, especially when terms of the agreement include "pouring concrete" and having "building inspections" before any buildings have been approved. Why vote before the CEQA process is complete? **Approval of this action item makes it more difficult for Commission members to consider alternatives and communicates to the public that you are proceeding without seriously considering the community's concerns.**

On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that you do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond.

The fact that the JPA again did not inform the public about this agenda item **continues to erode our trust.** R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. **Please inform community members when important votes related to our project are happening so we can comment adequately.**

I-18.1

Thank you!

Sincerely,

Susan Nipper
92508

Letter I-18

Susan Nipper
February 6, 2023

I-18.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Rick Lloyd <r.lloyd@gte.net>
Sent: Monday, February 6, 2023 10:27 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

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I-19.1

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

Thank you!

Sincerely,

Rick Lloyd
Orangecrest
92508

Letter I-19

Rick Lloyd
February 6, 2023

I-19.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: aramjim09@gmail.com
Sent: Monday, February 6, 2023 10:01 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

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I-20.1

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Thank you!

Sincerely,
Ana Ramirez
Orangecrest Neigborhood

Sent from my iPhone

Letter I-20

Ana Ramirez
February 6, 2023

I-20.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Carlos LLiguin <malinalli_1997@yahoo.com>
Sent: Monday, February 6, 2023 10:42 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Cc: Carlos LLiguin
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

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I-21.1

Thank you!

Sincerely,

Carlos Lliguin 92508

Letter I-21

Carlos Lliguin
February 6, 2023

I-21.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: ANTHONY SCIMIA JR <tscimia@sbcglobal.net>
Sent: Monday, February 6, 2023 10:21 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-22.1

On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that you do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond.

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.
I continuously hear warning beeping throughout the night.
Please stop any new industrial Warehouses now. Our quality of life has been drastically effected.

I-22.2

Thank you,
Anthony Scimia Jr
20829 Indigo Point
Riverside , CA, 92508

Sent from my iPhone

Letter I-22

Anthony Scimia Jr.
February 6, 2023

I-22.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

I-22.2 This comment raises concerns regarding existing noise conditions in the Project area associated with warning beeping. The comment also expresses opposition to future industrial warehouses development in the Project area. As detailed in Section 4.11, Noise, and Appendix M-1 of the Draft EIR, the noise analysis includes potential noise impacts associated with back-up beepers. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR.

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From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Tuesday, February 7, 2023 12:51 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-23.1

Letter I-23

Bobby Robinette
February 7, 2023

I-23.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Berenice Dixon <tb2truedixons@yahoo.com>
Sent: Tuesday, February 7, 2023 5:26 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

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I-24.1

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

Thank you!

Sincerely,

<Sign your name + neighborhood or zip code>

Berenice Dixon
(951) 550-7773

Letter I-24

Berenice Dixon
February 7, 2023

I-24.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Ajay Shah <ajayatsc@yahoo.com>
Sent: Tuesday, February 7, 2023 7:33 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

This email is meant as both public comment for Agenda Item 8(11) and a comment for the West Campus Upper Plateau Draft EIR.

Please do not add any more warehouses, especially in our back yards. Please listen to us.

I-25.1

I respectfully request that you abstain from voting to partially assign the West Campus Upper Plateau to Meridian West, LLC - Agenda Item 8(11) on the February 8 agenda. The public comment period for the DEIR is ongoing, and the March JPA has not completed the CEQA process. It appears pre-decisional to vote on partial assignment of the DDA before comments have been heard, especially when terms of the agreement include "pouring concrete" and having "building inspections" before any buildings have been approved. Why vote before the CEQA process is complete? Approval of this action item makes it more difficult for Commission members to consider alternatives and communicates to the public that you are proceeding without seriously considering the community's concerns.

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I-25.2

Thank you!

Sincerely,

Ajsy Shah
92508

Letter I-25

Ajay Shah
February 7, 2023

I-25.1 This comment expresses general opposition to the development of industrial warehouses in the Project area but does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR.

I-25.2 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Abby Banning <h2oabby@gmail.com>
Sent: Tuesday, February 7, 2023 12:09 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately. By not communicating and accommodating times for the working class neighborhood you are trying to change so drastically, the good faith and any good feelings that you are trying to negotiate with my community is quickly diminishing. How dare you side step the proper channels and move forward without hearing from the people directly affected?! Muscling and bullying your agenda and not showing interest in what the community is expressing is not a great way to lead to a positive final outcome for either side. Please give us a chance to explain why we are so upset with these future plans and make it so we don't have to take off work to do so. I-26.2

Thank you!

Sincerely,

Abigail Banning 92508/ Mission Grove

Letter I-26

Abigail Banning
February 7, 2023

I-26.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

I-26.2 This comment requests that the public be notified before any decisions associated with the Project are made. The comment also requests that any future meetings associated with the Project are held at a times that are outside of work hours to allow for the attendance of community members. The March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three workshops, and one Zoom virtual meeting with a public notification radius of 1.200 feet around the perimeter of the Project site resulting in 2,172 public notices. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No changes or additions to the project description or analyses including the Draft EIR are required.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Tuesday, February 7, 2023 6:22 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-27.1

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Thank you,
Aaron Bushong
23-year resident of the Orangecrest neighborhood (92508)

Letter I-27

Aaron Bushong
February 7, 2023

I-27.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: mkymsecltr <mkymsecltr@aol.com>
Sent: Tuesday, February 7, 2023 5:44 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-28.1

Thank you!

Sincerely,

John W. Hagmann
92506

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-28

John Hagmann
February 7, 2023

I-28.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Jean Aklufi <jeanaklufi@gmail.com>
Sent: Tuesday, February 7, 2023 6:30 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-29.1

Thank you!

Sincerely,

Jean Aklufi

Letter I-29

Jean Aklufi
February 7, 2023

I-29.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Tuesday, February 7, 2023 10:16 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

This email is meant as both public comment for Agenda Item 8(11) and a comment for the West Campus Upper Plateau Draft EIR.

I respectfully request that you abstain from voting to partially assign the West Campus Upper Plateau to Meridian West, LLC - Agenda Item 8(11) on the February 8 agenda. The public comment period for the DEIR is ongoing, and the March JPA has not completed the CEQA process. It appears pre-decisional to vote on partial assignment of the DDA before comments have been heard, especially when terms of the agreement include "pouring concrete" and having "building inspections" before any buildings have been approved. Why vote before the CEQA process is complete? Approval of this action item makes it more difficult for Commission members to consider alternatives and communicates to the public that you are proceeding without seriously considering the community's concerns.

On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that you do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond.

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-30.1

Thank you!

Sincerely,
Joseph S. Aklufi
Riverside, 92506

Joe Aklufi
(951)377-4255

Letter I-30

Joseph Aklufi
February 7, 2023

I-30.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Jodi Mullarky <jodi.mullarky@outlook.com>
Sent: Tuesday, February 7, 2023 10:49 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

This email is meant as both public comment for Agenda Item 8(11) and a comment for the West Campus Upper Plateau Draft EIR.
I respectfully request that you abstain from voting to partially assign the West Campus Upper Plateau to Meridian West, LLC - Agenda Item 8(11) on the February 8 agenda. The public comment period for the DEIR is ongoing, and the March JPA has not completed the CEQA process. It appears pre-decisional to vote on partial assignment of the DDA before comments have been heard, especially when terms of the agreement include "pouring concrete" and having "building inspections" before any buildings have been approved. Why vote before the CEQA process is complete? Approval of this action item makes it more difficult for Commission members to consider alternatives and communicates to the public that you are proceeding without seriously considering the community's concerns.

On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that you do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond.

I-31.1

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

Thank you!

Jodi Mullarky
Mission Grove neighborhood, 92508

Letter I-31

Jodi Mullarky
February 7, 2023

I-31.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Tuesday, February 7, 2023 4:07 PM
To: Cindy Camargo
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear March JPA and Commission Members,

This email is meant as both public comment for Agenda Item 8(11) and a comment for the West Campus Upper Plateau Draft EIR which I am spending considerable personal time reading and responding to because it is a clear example of bad land use planning, poor government oversight, and a disregard of humanity.

While I cannot attend in person due to the rigors of a full-time job, I thought it important to write today to respectfully request that you vote against or abstain from voting to partially assign the West Campus Upper Plateau to Meridian West, LLC - Agenda Item 8(11) on the February 8 agenda, though I realize the assignment may well take place regardless of your actions. The public comment period for the draft EIR is ongoing, and the March JPA has not completed the CEQA process. The assignment of any part of this land appears pre-decisional. To vote on partial assignment of the DDA before comments have been heard, especially when terms of the agreement include "pouring concrete" and having "building inspections" before any buildings have been approved, signals to the community directly impacted by this project that the developer never considered non-industrial options in their plans. Why vote before the CEQA process is complete? Approval of this action item makes it more difficult for Commission members to consider non-industrial alternatives and communicates to the public that the JPA is proceeding without seriously addressing our concerns. I-32.1

On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the draft EIR and was buried in an agenda for a regular JPA meeting happening at a normal Wednesday afternoon meeting. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that the JPA do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond.

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. My neighbors and I have asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. I hope you take this time to demonstrate your accountability to the public.

Thank you!

Sincerely,

Jerry Shearer

92508

Letter I-32

Jerry Shearer Jr.
February 7, 2023

I-32.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: J Gonsman <teamgonsman@yahoo.com>
Sent: Tuesday, February 7, 2023 9:24 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members, This email is meant as both public comment for Agenda Item 8(11) and a comment for the West Campus Upper Plateau Draft EIR. I respectfully request that you abstain from voting to partially assign the West Campus Upper Plateau to Meridian West, LLC - Agenda Item 8(11) on the February 8 agenda. The public comment period for the DEIR is ongoing, and the March JPA has not completed the CEQA process. It appears pre-decisional to vote on partial assignment of the DDA before comments have been heard, especially when terms of the agreement include "pouring concrete" and having "building inspections" before any buildings have been approved. Why vote before the CEQA process is complete? Approval of this action item makes it more difficult for Commission members to consider alternatives and communicates to the public that you are proceeding without seriously considering the community's concerns. On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that you do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond. The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately. Thank you!

I-33.1

Sincerely,
Jason Gonsman
92508, Orange Crest

Letter I-33

Jason Gonsman
February 7, 2023

I-33.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Janice Oien <gdojlo@yahoo.com>
Sent: Tuesday, February 7, 2023 7:27 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

This email is meant as both public comment for Agenda Item 8(11) and a comment for the West Campus Upper Plateau Draft EIR.

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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-34.1

Thank you!
Janice oien. 92508
Sincerely,

<Sign your name + neighborhood or zip code>

Sent from my iPhone

Letter I-34

Janice Oein
February 7, 2023

I-34.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Lenora Mitchell <rageturner@gmail.com>
Sent: Tuesday, February 7, 2023 8:09 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-35.1

Thank you,

Lenora Mitchell
92508

Letter I-35

Lenora Mitchell
February 7, 2023

I-35.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: K Doty <dkdoty2@gmail.com>
Sent: Tuesday, February 7, 2023 3:58 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

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I-36.1

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

Thank you!

Sincerely,

Kristy Doty
92508

Sent from my iPhone

Letter I-36

Kristy Doty
February 7, 2023

I-36.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Karen Bartell <kjbartell@sbcglobal.net>
Sent: Tuesday, February 7, 2023 3:34 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.Thank you .
Sincerely,
Karen Bartell
Orange Crest Country
92508

I-37.1

Sent from my iPhone

Letter I-37

Karen Bartell
February 7, 2023

I-37.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Juan Garcia <garciajuan08@gmail.com>
Sent: Tuesday, February 7, 2023 9:40 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

This email is meant as both public comment for Agenda Item 8(11) and a comment for the West Campus Upper Plateau Draft EIR.

I-38.1

I respectfully request that you abstain from voting to partially assign the West Campus Upper Plateau to Meridian West, LLC - Agenda Item 8(11) on the February 8 agenda. The public comment period for the DEIR is ongoing, and the March JPA has not completed the CEQA process. It appears pre-decisional to vote on partial assignment of the DDA before comments have been heard, especially when terms of the agreement include “pouring concrete” and having “building inspections” before any buildings have been approved. Why vote before the CEQA process is complete? Approval of this action item makes it more difficult for Commission members to consider alternatives and communicates to the public that you are proceeding without seriously considering the community’s concerns.

On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and comment period.

Has the property been declared surplus in compliance Surplus Land Act guidelines? I have not seen proper noticing requirements with the Surplus Land Act. This property transfer should not happen at this time.
https://www.hcd.ca.gov/community-development/docs/sla_guidelines_final.pdf

I-38.2

Juan Garcia
Syracuse St. 92508

Letter I-38

Juan Garcia
February 7, 2023

I-38.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

I-38.2 The comment questions whether the Project site is located on land that has been declared surplus in compliance with the Surplus Land Act Guidelines, and if the required noticing has been distributed, as established in the Surplus Land Act Guidelines. The Specific Plan Area is owned by the applicant and not subject to the Surplus Land Act. No further response is required.

INTENTIONALLY LEFT BLANK

From: Josie Sosa <josie.sosa@gmail.com>
Sent: Tuesday, February 7, 2023 6:40 AM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-39.1

Thank you!

Sincerely,

Josie Sosa
92508

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Josie Sosa

Letter I-39

Josie Sosa
February 7, 2023

I-39.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: John Viafora <jrviafora@gmail.com>
Sent: Tuesday, February 7, 2023 9:58 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-40.1

Thank you!

Sincerely,

John & Mary Viafora 92508

Sent from my iPhone

Letter I-40

John and Mary Viafora
February 7, 2023

I-40.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: john hathaway <john363444@gmail.com>
Sent: Tuesday, February 7, 2023 2:19 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

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I-41.1

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

Thank you!

Sincerely,

<Sign your name + neighborhood or zip code>

Letter I-41

John Hathaway
February 7, 2023

I-41.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Christine Heinemann <caheinemann@gmail.com>
Sent: Tuesday, February 7, 2023 11:12 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

This email is meant as both public comment for Agenda Item 8(11) and a comment for the West Campus Upper Plateau Draft EIR.

I respectfully request that you abstain from voting to partially assign the West Campus Upper Plateau to Meridian West, LLC - Agenda Item 8(11) on the February 8 agenda. The public comment period for the DEIR is ongoing, and the March JPA has not completed the CEQA process. It appears pre-decisional to vote on partial assignment of the DDA before comments have been heard, especially when terms of the agreement include "pouring concrete" and having "building inspections" before any buildings have been approved. Why vote before the CEQA process is complete? Approval of this action item makes it more difficult for Commission members to consider alternatives and communicates to the public that you are proceeding without seriously considering the community's concerns.

On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that you do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond.

I-42.1

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

Thank you!

Sincerely,

Christine Heinemann 92508
Orangecrest

Letter I-42

Christine Heinemann
February 7, 2023

I-42.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Chris Hannon <chrishannon25@gmail.com>
Sent: Tuesday, February 7, 2023 10:26 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

In closing, please consider the long term effects of the proposed construction. Lack of open space, increases in air pollution, noise, and local traffic. our children and grandchildren will be the recipients of mistakes made today. What will be the outcome 50 years from now? We tend to think in the now and disregard the future effects and costs both in health and monetary. I-43.2

Thank you!

Sincerely,

Chris Hannon
Victoria Park
92506

Letter I-43

Chris Hannon
February 7, 2023

I-43.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

I-43.2 The comment raises concerns regarding potential Project impacts on open space, air pollution, noise, and traffic. The analysis of these areas is contained in Chapter 4, Environmental Analysis, of the Draft EIR. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No changes or additions to the project description or analyses including the Draft EIR are required.

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From: Chad Smith <chadsmithx@gmail.com>
Sent: Tuesday, February 7, 2023 6:29 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-44.1

Thank you!

Sincerely,

Chad Smith
chadsmithx@gmail.com
8433 Gessay Place
Riverside Ca 92508
Cell 909-225-4077
Fax 951-653-1003

Letter I-44

Chad Smith
February 7, 2023

I-44.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Brian Wardle <wardleb@gmail.com>
Sent: Tuesday, February 7, 2023 8:42 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-45.1

Thank you!

Sincerely,

Brian Wardle
Orangecrest Neighborhood, 92508

Letter I-45

Brian Wardle
February 7, 2023

I-45.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement

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From: Gerardo Arenas <adelante1@mac.com>
Sent: Tuesday, February 7, 2023 12:04 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-46.1

Thank you!

Sincerely,

Gerardo Arenas
Orangecrest Community Member

Letter I-46

Gerardo Arenas
February 7, 2023

I-46.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: The Harvilla Family <harvilla4@msn.com>
Sent: Tuesday, February 7, 2023 1:50 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; Perry, Jim; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

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Please inform community members when important votes related to our project are happening so we can comment adequately.

I-47.1

Thank you.

Sincerely,

George Harvilla
Orangecrest, Riverside 92508

Letter I-47

George Harvilla
February 7, 2023

I-47.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Eunhee Kim <eunster@yahoo.com>
Sent: Tuesday, February 7, 2023 4:45 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-48.1

Thank you!

Sincerely,
Eunhee Kim
Raleigh, NC 27615

Letter I-48

Eunhee Kim
February 7, 2023

I-48.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Elizabeth Wexler <lishkawex@icloud.com>
Sent: Tuesday, February 7, 2023 7:01 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-49.1

Thank you!

Sincerely,

<Sign your name + neighborhood or zip code>

Sent from my iPhone

Letter I-49

Elizabeth Wexler
February 7, 2023

I-49.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: E E_____Ha__ <eestrella25@msn.com>
Sent: Tuesday, February 7, 2023 10:04 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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Why vote before the CEQA process is complete? Approval of this action item makes it more difficult for Commission members to consider alternatives and communicates to the public that you are proceeding without seriously considering the community's concerns.

On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public.

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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-50.1

Thank you,

Elisa Estrella-Hahn
92508

Letter I-50

Elise Estrella-Hahn
February 7, 2023

I-50.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Denette Lemons <lemonsdenette@gmail.com>
Sent: Tuesday, February 7, 2023 1:52 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-51.1

Thank you!

Sincerely,
Denette Lemons
<Sign your name + neighborhood or zip code>

Letter I-51

Denette Lemons
February 7, 2023

I-51.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Melissa Suarez <melissaims@yahoo.com>
Sent: Tuesday, February 7, 2023 10:34 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that you do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond.

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust in this whole process and does not show the impartiality that is supposed to occur. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

I-52.1

Thank you!

Sincerely,

Melissa Suarez
Zip code 92508

Letter I-52

Melissa Suarez
February 7, 2023

I-52.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Viviane Baerenklau <vbaerenklau@yahoo.com>
Sent: Tuesday, February 7, 2023 9:18 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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Thank you!

Sincerely,
Viviane
Orangecrest, 92508

Letter I-53

Viviane Baerenklau
February 7, 2023

I-53.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Tuesday, February 7, 2023 4:46 PM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

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I-54.1

Thank you!

Sincerely,

Veronica Juarez
Orangecrest
92508

Letter I-54

Veronica Juarez
February 7, 2023

I-54.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: KELLEY PAGE <kpage68684@verizon.net>
Sent: Tuesday, February 7, 2023 10:09 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-55.1

Thank you!

Sincerely,

Suzanne Page
Orangecrest 92508

Sent from my iPad

Letter I-55

Kelley Page
February 7, 2023

I-55.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Susana Balmer <balmer.susana@gmail.com>
Sent: Tuesday, February 7, 2023 1:42 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-56.1

Thank you!

Sincerely,

Susana Balmer
Orangecrest 92508

Letter I-56

Susana Balmer
February 7, 2023

I-56.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Sara Amend <jnsamend@gmail.com>
Sent: Tuesday, February 7, 2023 4:13 PM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
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I-57.1

Thank you,
Sara Amend 92508

Letter I-57

Sara Amend
February 7, 2023

I-57.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Richard Stalder <xcoachrs@sbcglobal.net>
Sent: Tuesday, February 7, 2023 6:43 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-58.1

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Thank you!

Sincerely,

Sent from my iPad

Letter I-58

Richard Stadler
February 7, 2023

I-58.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Tuesday, February 7, 2023 7:50 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-59.1

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Thank you!

Sincerely,

Peter Pettis
92508

Letter I-59

Peter Pettis
February 7, 2023

I-59.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Nicole Bernas <onecosmiclove@icloud.com>
Sent: Tuesday, February 7, 2023 7:52 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that you do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond.

I strongly encourage you to read this article published in the Los Angeles Times. https://www.pressreader.com/usa/los-angeles-times-sunday/20230205/281522230239990 I-60.2

Our air quality here in Riverside is unhealthy and I urge you to wait on making any decisions before the CEQA process is complete. I-60.3

Thank you.

Sincerely,

Nicole-Lynn :Bernas
[92508]



Letter I-60

Nicole-Lynn Bernas
February 7, 2023

I-60.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

I-60.2 This comment provides a link to an article that discusses warehouse related pollution in the Inland Empire. The article discusses how demand for industrial warehouses has continued to grow and to provide employment opportunities, but this growth has come at a cost for the communities in which these warehouses are located. The article further discusses moratoriums being put in place in some Inland Empire cities. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No changes or additions to the project description or analyses including the Draft EIR are required.

I-60.3 This comment states that air quality in the City of Riverside is unhealthy and urges the March JPA to complete the CEQA process before making any decisions. The analysis of Project air quality impacts is included in Recirculated Section 4.2, Air Quality. The comment does not raise specific concerns regarding the adequacy of the environmental analysis in the Draft EIR. No changes or additions to the project description or analyses including the Draft EIR are required. The March Joint Powers Commission will consider the Final EIR as part of the consideration of the Project.

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From: Nancy Magi <troutquilt@sbcglobal.net>
Sent: Tuesday, February 7, 2023 7:59 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-61.1

Thank you!

Sincerely,

<Sign your name + neighborhood or zip code>

Nancy
Sent from my iPhone

Letter I-61

Nancy Magi
February 7, 2023

I-61.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Michele Muehls <michelebello@hotmail.com>
Sent: Tuesday, February 7, 2023 10:21 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-62.1

Thank you for your attention and patience in this matter.

Sincerely,

Michele Muehls
Hawarden 92506

~Michele
Sent from my iPhone

Letter I-62

Michele Muehls
February 7, 2023

I-62.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Melody Clark <melodyeclark@icloud.com>
Sent: Tuesday, February 7, 2023 8:23 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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Please consider the very reasonable opinions of those in this community who are directly affected by these actions.

I-63.1

Sincerely,
Melody Clark
Riverside, CA 92506

Sent from my iPad

Letter I-63

Melody Clark
February 7, 2023

I-63.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: matt silveous <mattsilveous1812@gmail.com>
Sent: Tuesday, February 7, 2023 1:43 PM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
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I-64.1

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This project seems very predetermined base on the actions of the MJPA , and the complete disregard for the public that will be effected by it every day!!!

Matt Silveous
20815 indigo point
92508

Letter I-64

Matt Silveous
February 7, 2023

I-64.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Shaan Saigol <shaansaigol@gmail.com>
Sent: Tuesday, February 7, 2023 1:03 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
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I-65.1

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Thank you!

Sincerely,

Shaan Saigol, Orangecrest Neighborhood (92508)

Letter I-65

Shaan Saigol
February 7, 2023

I-65.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: sergio salazar <ssalazar77@gmail.com>
Sent: Tuesday, February 7, 2023 5:14 AM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

This email is meant as both public comment for Agenda Item 8(11) and a comment for the West Campus Upper Plateau Draft EIR.

I respectfully request that you abstain from voting to partially assign the West Campus Upper Plateau to Meridian West, LLC - Agenda Item 8(11) on the February 8 agenda. The public comment period for the DEIR is ongoing, and the March JPA has not completed the CEQA process. It appears pre-decisional to vote on partial assignment of the DDA before comments have been heard, especially when terms of the agreement include "pouring concrete" and having "building inspections" before any buildings have been approved. Why vote before the CEQA process is complete? Approval of this action item makes it more difficult for Commission members to consider alternatives and communicates to the public that you are proceeding without seriously considering the community's concerns.

On October 26, 2022, the Commission voted to allow the Executive Director to convey the 17th Option Parcel to the developer and approved a Schedule of Payment that explicitly outlined payments for four buildings on the site. This vote happened months before the release of the Draft Environmental Impact Report and was buried in an agenda for a regular JPA meeting happening on a Wednesday afternoon. No notification was sent out to the public. R-NOW sent a letter on November 28, 2022 outlining the ways this action could be interpreted as pre-decisional and asked that you do better in informing our active and concerned community about future actions taken in relation to the West Campus Upper Plateau so that we have adequate time to respond. I-66.1

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

The recent article in the LA Times about the number of warehouses in our area is very concerning as a father of two young ones. I want them to grow up in a good, healthy environment. I-66.2

Thank you!

Sincerely,

Sergio Salazar,
Orangecrest neighborhood resident, Riverside
--

Check our Yelp Reviews.



Sergio Salazar / Broker Associate
ssalazar77@gmail.com / 951-897-6518

Vylla Home inc.
Office: 951-251-4736 / Fax: 866-284-7996
3516 9th St. Unit A Riverside, Ca 92501

Ca. BRE# 01447204

http://www.granvistarealty.com

What's My Home Worth?

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Letter I-66

Sergio Salazar
February 7, 2023

I-66.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

I-66.2 This comment cites an article that discusses warehouse related pollution in the Inland Empire. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No changes or additions to the project description or analyses including the Draft EIR are required.

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From: Steven Balmer <sjgbalmer@gmail.com>
Sent: Wednesday, February 8, 2023 12:03 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

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I-67.1

The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

Thank you!

Sincerely,

Steve Balmer
Orangecrest, Riverside CA 92508

Letter I-67

Steve Balmer
February 8, 2023

I-67.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

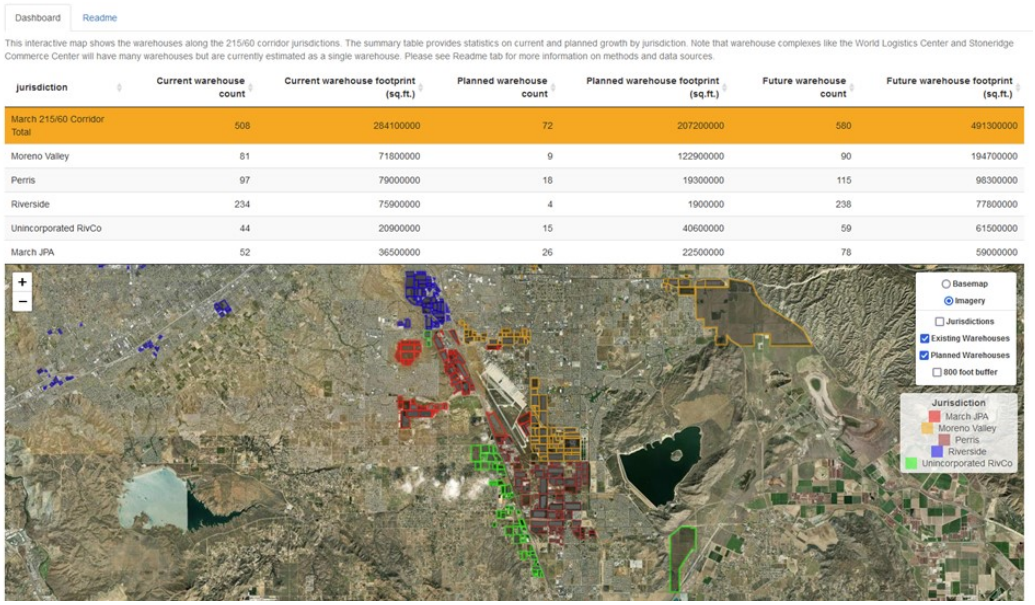
INTENTIONALLY LEFT BLANK

From: Mike McCarthy <uber.snotling@gmail.com>
Sent: Wednesday, February 8, 2023 2:18 PM
To: Conder, Chuck; edd@moval.org; Supervisor Jeffries - 1st District; district5@rivco.org; mvargas@cityofperris.org; mayor@moval.org; Perry, Jim; rrogers@cityofperris.org; Dan Fairbanks
Subject: Cumulative impacts map app - Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, Commissioners,

Attached please find a link to a website displaying the warehouses and planned warehouses along the 215/60 corridor surrounding March ARB. I-68.1

https://radicalresearch.shinyapps.io/MarchJPA/



Please include this as part of public comment on the draft EIR indicating the proper domain for regional cumulative impacts effects analyses performed within the EIR. The existing list of projects on Table 4-2 within the draft EIR omits over 3,500 acres of approved and planned warehouse projects within the region. The draft EIR omissions are material; proper inclusion of these projects would demonstrate that transportation impacts are significant and unavoidable, and air quality impacts are substantially greater than claimed. I-68.2

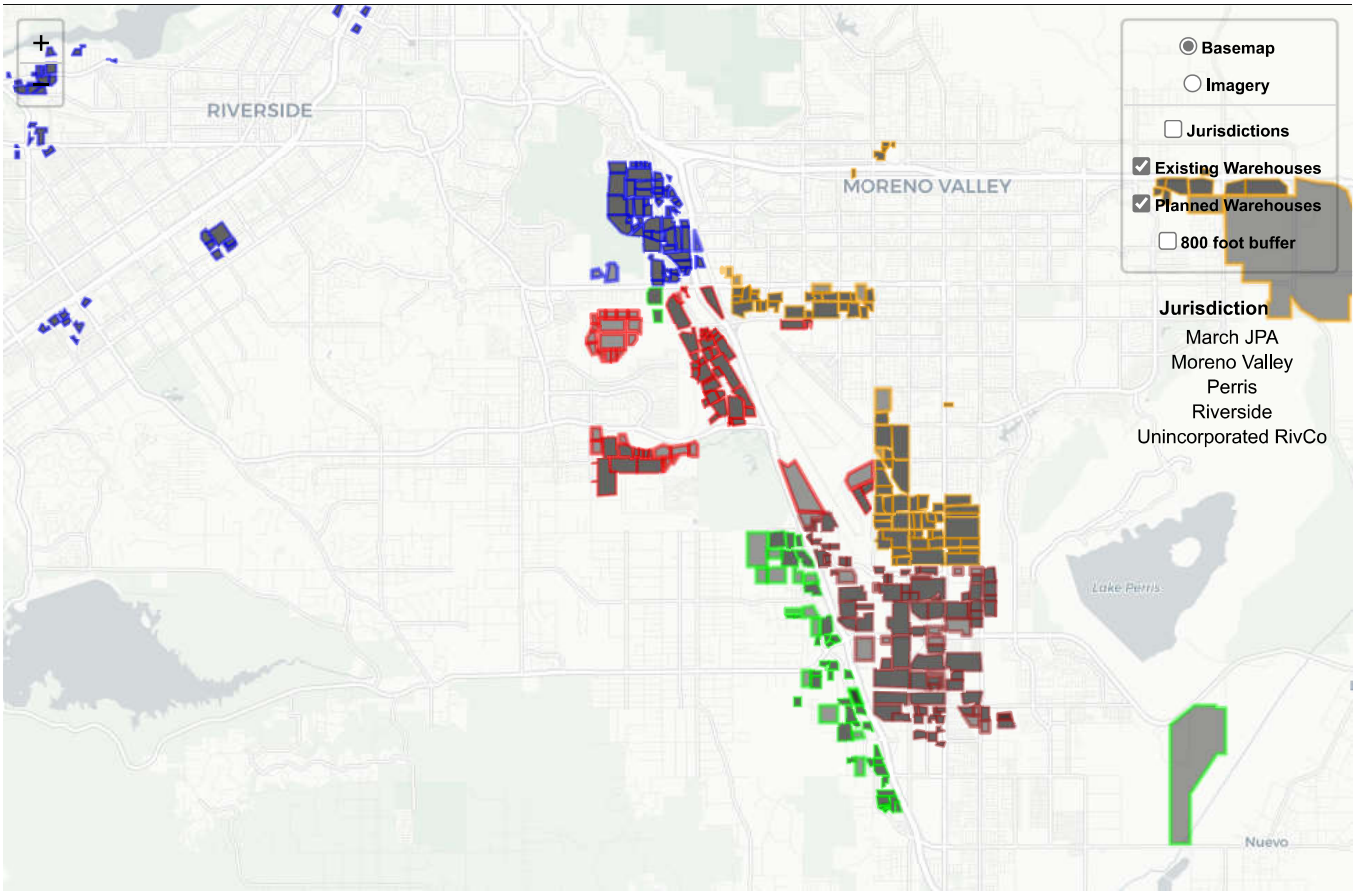
Mike McCarthy
Riverside Neighbors Opposing Warehouses

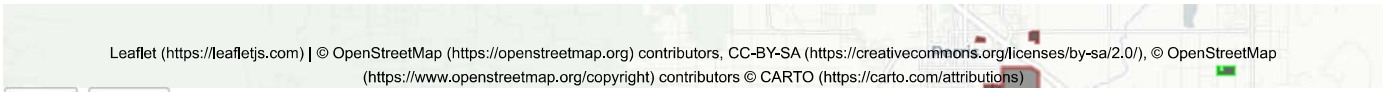
Warehouses on the 215/60 Corridor

Dashboard | Readme

This interactive map shows the warehouses along the 215/60 corridor jurisdictions. The summary table provides statistics on current and planned growth by jurisdiction. Note that warehouse complexes like the World Logistics Center and Stoneridge Commerce Center will have many warehouses but are currently estimated as a single warehouse. Please see Readme tab for more information on methods and data sources.

jurisdiction	Current warehouse count	Current warehouse footprint (sq.ft.)	Planned warehouse count	Planned warehouse footprint (sq.ft.)	Future warehouse count	Future warehouse footprint (sq.ft.)
March 215/60 Corridor Total	514	286300000	73	207300000	587	493600000
Moreno Valley	81	71800000	9	122900000	90	194700000
Perris	97	79000000	18	19300000	115	98300000
Riverside	234	75900000	4	1900000	238	77800000
Unincorporated RivCo	50	23100000	15	40600000	65	63700000
March JPA	52	36500000	27	22600000	79	59100000





CSV Excel

Planned and approved warehouses

project	buildingID	project size (sq.ft.)	jurisdiction	CEQA step/type	developer	year	link
All	All	All	All	All	All		All
World Logistics Center	World Logistics Center	40400400	Moreno Valley	Approved	Highland Fairview	2020	Enviromental document (https://www.moval.org/cdd/pdfs/projects/wlc/2020-Revised/WLC-NoticeOfDetermination.pdf)
Stoneridge Commerce Center	Stoneridge Commerce Center	9398070	Unincorporated RivCo	Pending, EIR complete	Richland Developers, Inc.	2022	Enviromental document (https://planning.rctlma.org/Portals/14/Stoneridge)
West Campus Upper Plateau	West Campus Mega 1	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus Mega 2	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus Mega 3	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus reg 1	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus reg 2	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus reg 3	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus reg 4	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus reg 5	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus reg 6	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)

project	buildingID	project size (sq.ft.)	jurisdiction	CEQA step/type	developer	year	link
West Campus Upper Plateau	West Campus reg 7	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus MixedUse 1	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus MixedUse 2	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)
West Campus Upper Plateau	West Campus MixedUse 3	4500000	March JPA	Draft EIR in review	Meridan West LLC	2023	Enviromental document (https://marchjpa.com/mjpa-meridian-west-campus/)

Previous 1 2 3 4 5 Next

Warehouses on the 215/60 Corridor

Dashboard | Readme

RNOW March JPA Warehouse Map

Introduction

The Riverside Neighbors Opposing Warehouses (RNOW) (https://sites.google.com/view/rivnow/) Map of Warehouses on the 215/60 Corridor is a publicly available tool developed to help visualize the development of warehouses around the March Air Reserve Base. This dashboard is largely based off of the Warehouse CITY (https://radicalresearch.shinyapps.io/WarehouseCITY/) tool developed in collaboration by Redford Conservancy at Pitzer College (https://www.pitzer.edu/redfordconservancy/) and Radical Research LLC (http://radicalresearch.llc). That tool allows additional quantification capabilities. The RNOW community group opposes new warehouse development around the Orangecrest and Mission Grove neighborhoods of the City of Riverside. The communities surrounding the March Inland Port area already have the second highest density of warehouse development in the Inland Empire. Over 280 warehouses around March ARB along the 215 corridor cumulatively cover over 4800 acres and have a footprint over 210 million square feet. We estimate that these warehouses generate about 90,000 truck trips daily.

This map also displays planned warehouses. The estimated warehouse footprint in the planning pipeline will double the space currently built. Most of that space is already fully approved - the biggest addition is the World Logistics Center that will add over 40 million square feet of warehouses along the 60 corridor in east Moreno Valley. The Stoneridge Commerce Center in Unincorporated Riverside County is another 9 million square feet of warehouses. The third largest planned warehouse complex is the West Campus Upper Plateau by the March JPA at about 4.5 million square feet of warehouses.

Land-use (more like warehouse) Authorities

Five land-use authorities contribute to the warehouses around the March ARB and 215/60 corridor.

- City of Riverside (https://riversideca.gov/) - Over 50 warehouses in the Sycamore Canyon Business Park (~20M sq.ft.). A few more are planned but Riverside is about 90% built out.
- City of Moreno Valley (https://moval.gov/index.shtml) - Over 75 warehouse along Cactus Avenue and along Indian Street near the March ARB. (~39M sq.ft.). The World Logistics Center warehouse complex will double its footprint in the next few years.
- City of Perris (https://www.cityofperris.org/) - Over 75 warehouses along Perris Blvd. and Ramona Expressway (~44M sq.ft.). At least another 18 warehouses are in planning or construction phases which will add just under 10M square feet.
- Riverside County (https://rivco.org/) - Over 45 warehouses, mostly alongside the 215 Corridor South of Riverside National Cemetary (~14M sq.ft.). The Mead Valley warehouses will add another dozen warehouses

and 6 million square feet while the Stoneridge Commerce Center complex near Nuevo will add another 9.4 million square feet.
- March Joint Powers Authority (https://marchjpa.com/) - About 55 warehouses, directly adjacent to March ARB, along Van Buren, and along the 215 Corridor between Alessandro and Van Buren (~36M sq.ft.). Another 9.5 million square feet are under construction or planned.

The March Joint Powers Authority (MJPA) is a quasi-governmental land-use authority that is comprised of eight commissioners (https://marchjpa.com/about/march-joint-powers-commission/) from the four governmental agencies. Two commissioners are from each of the cities (Moreno Valley, Perris, Riverside) and another two are from the County.

Map and Data Provenance

The map can be navigated using point, click, and drag features or by clicking on the zoom plus and minus buttons on the top left corner of the map. At the top right of the map, the imagery can be switched between a street level **Basemap** and satellite **Imagery**. Polygon overlays can be turned on or off by selecting the check boxes for **Jurisdictions**, **Existing Warehouses**, **Planned Warehouses**, and **800 foot buffer**.

- **Jurisdictions**: This shows the boundaries for Moreno Valley, Perris, Riverside, March JPA, and Unincorporated Riverside County. Data were obtained from RivCo Open Data Cities (https://gisopendata-countyofriverside.opendata.arcgis.com/datasets/CountyofRiverside::cities/explore) and census designated places (https://gisopendata-countyofriverside.opendata.arcgis.com/datasets/f84b20601ad84a1e8b6333e5fad041f8_0/about). The March JPA boundary is discontinuous. Note that this dataset was provided as a personal communication with the County of Riverside. As noted by the County - *"The County of Riverside is not the custodian of records for the March Airforce Base Joint Powers Authority and therefore cannot ensure the accuracy of records in its possession that are related to the JPA."* Multiple public records request to the March JPA requesting boundary information were denied as the March JPA *"do not have the requested information available"*.
- **Existing warehouses**: Data processed using methodology established in Warehouse City tool v1.09. Raw data from RivCo assessor data (https://gis2.rivco.org/).
- **Planned Warehouses** - Polygons based on EIR documents from March JPA, City of Riverside, City of Moreno Valley, City of Perris, and County of Riverside as of January 2, 2023.
- **800 foot buffer**: This is based on the 2020 City of Riverside Good Neighbor Guidelines (https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/2021/Good%20Neighbor%20Guidelines.pdf) and Title 19 Zoning standards (https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT19ZO_ARTVBAZOREUSDEPR_CH19.130INZOBMIAIAI_19.130.030DESTINZO)

Contact and Support

- If you have questions or suggestions, please email mikem@radicalresearch.llc (mailto:mikem@radicalresearch.llc){.email}
- If you are interested in supporting or becoming a member of local organizations opposing warehouse development adjacent to residential communities, please check out RNOW (https://tinyurl.com/RIVNOW), Center for Community Action and Environmental Justice (CCAEJ) (https://www.ccaej.org/), and the Redford Conservancy at Pitzer College (https://www.pitzer.edu/redfordconservancy/).

Letter I-68

Mike McCarthy
February 8, 2023

I-68.1 This comment references a website displaying the warehouses and planned warehouses along the 215/60 corridor surrounding the March Air Reserve Base. The website information has been downloaded and included as an attachment to this comment letter. This comment is informational and does not raise any questions, comments, or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-68.2 This comment alleges that Table 4-2 of the Draft EIR omits over 3,500 acres of approved and planned warehouse projects within the region for analysis of cumulative impacts such that cumulative transportation impacts would be significant and unavoidable and cumulative air quality impacts would be substantially greater than those disclosed in the Draft EIR. With respect to development of the cumulative projects list and the Draft EIR's cumulative analysis for each issue area, please see Topical Response 7 – Cumulative Projects. Regarding transportation impacts, traffic delay is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. Please see the Final EIR and Appendix C-2 for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of one in a million. As discussed in the Final EIR and Appendix C-1, because the proposed Project would exceed the project-level regional significance thresholds for emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$, the Project's cumulative impacts with respect to such emissions would be considerable and significant. However, as discussed in briefs filed in the case of *Sierra Club v. County of Fresno* (2018), SCAQMD noted that it may be "difficult to quantify health impacts for criteria pollutants." SCAQMD used O_3 as an example of why it is impracticable to determine specific health outcomes from criteria pollutants for all but very large, regional-scale projects. First, forming O_3 "takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources." Second, "it takes a large amount of additional precursor emissions (NOX and VOCs) to cause a modeled increase in ambient ozone levels over an entire region," with a 2012 study showing that "reducing NOX by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion." Additionally, the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) ties the difficulty of correlating the emission of criteria pollutants to health impacts to how ozone and particulate matter are formed, stating that "[b]ecause of the complexity of ozone formation, a specific tonnage amount of NOX or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area." Similarly, the tonnage of PM "emitted does not always equate to the local PM concentration because it can be transported long distances by wind," and "[s]econdary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as sulfur dioxides (SOX) and NOX," meaning that "the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area." The disconnect between the amount of precursor pollutants and the concentration of ozone or PM formed makes it difficult to determine potential health impacts, which are related to the concentration of ozone and PM experienced by the receptor rather than levels of NOX, SOX, and VOCs produced by a source. (Appendix C-4)

As detailed in the Final EIR and Appendix C-1, the LST analysis demonstrates that neither Project construction nor operation would exceed the applicable SCAQMD localized significance thresholds. Therefore, the Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_x, PM_{10}, or $PM_{2.5}$. (Appendix C-4)

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Friday, February 10, 2023 2:26 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment for Agenda Item 8(11) and Comment for DEIR

Dear Commission Members,

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The fact that the JPA again did not inform the public about this agenda item continues to erode our trust. R-NOW has asked on numerous occasions to be adequately informed of decisions related to the West Campus Upper Plateau. Please inform community members when important votes related to our project are happening so we can comment adequately.

Thank you!

Sincerely,

<Sign your name + neighborhood or zip code>

Sent from my iPhone

Letter I-69

Linda Tingly
February 10, 2023

I-69.1 This comment raises questions regarding actions taken by the March Joint Powers Commission related to the West March Development and Disposition Agreement (DDA). In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement.

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From: Cindy Camargo <camargo@marchjpa.com>
Sent: Friday, February 17, 2023 8:41 PM
To: Sylvia Melgoza
Subject: The development project in Mission Grove.

Greetings and thank you for your message and interest in the Meridian West Campus - Upper Plateau proposal by Meridian Park LLC. We have received your email and noted your written comments. The project of interest is currently under review by March JPA. Any updates will be provided on the following MJPA website link - https://marchjpa.com/mjpa-meridian-west-campus/.

Thank you again,

March Joint Powers Authority
www.marchjpa.com

-----Original Message-----
From: Sylvia Melgoza <sylviamelgoza01@gmail.com>
Sent: Friday, February 17, 2023 11:03 AM
To: Cindy Camargo <camargo@marchjpa.com>
Subject: The development project in Mission Grove.

Please stop this development. I'm already ill as it is with pollution from all the warehouses and trucks in the area. I moved from OC just to be able to breath. I have been ill with respiratory issues. Let us keep it from becoming a place that we will not be able to breath free air. I-70.1

Sent from my iPhone

Letter I-70

Sylvia Melgoza
February 17, 2023

I-70.1 This comment states that the commenter is ill from air pollution related to warehouses and trucks. The comment does not raise any specific issues or concerns about the adequacy of the environmental analysis within the Draft EIR and instead expresses general opposition to the Project.

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From: matt silveous <mattsilveous1812@gmail.com>
Sent: Tuesday, February 21, 2023 10:18 AM
To: Dan Fairbanks

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional

warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Matt Silveous
20815 indigo point riverside,ca

Letter I-71

Matt Silveous
February 21, 2023

I-71.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: matt silveous <mattsilveous1812@gmail.com>
Sent: Tuesday, February 21, 2023 1:34 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Matt Silveous
20815 indigo point riverside,ca

Letter I-72

Matt Silveous
February 21, 2023

I-72.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: matt silveous <mattsilveous1812@gmail.com>
Sent: Tuesday, February 21, 2023 9:00 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Matt Silveous
20815 indigo point Riverside, ca

Thank you for the opportunity to comment.

Sincerely,

Letter I-73

Matt Silveous
February 21, 2023

I-73.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Karrie Brusselback <kwbrusselback@gmail.com>
Sent: Tuesday, February 21, 2023 3:13 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Karrie Brusselback
5561 Cornwall Ave
Riverside, CA 92506
kwbrusselback@gmail.com

Letter I-74

Karrie Brusselback
February 21, 2023

I-74.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Karrie Brusselback <kwbrusselback@gmail.com>
Sent: Tuesday, February 21, 2023 3:13 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Karrie Brusselback
5561 Cornwall Ave
Riverside, CA 92506
kwbrusselback@gmail.com

Letter I-75

Karrie Brusselback
February 21, 2023

I-75.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Karrie Brusselback <kwbrusselback@gmail.com>
Sent: Tuesday, February 21, 2023 3:12 PM
To: Dan Fairbanks
Subject: Action Against Warehouses

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Karrie Brusselback
5561 Cornwall Ave
Riverside, CA 92506
kwbrusselback@gmail.com

Letter I-76

Karrie Brusselback
February 21, 2023

I-76.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Juan Garcia <garciajuan08@gmail.com>
Sent: Tuesday, February 21, 2023 1:39 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Juan Garcia
garciajuan08@gmail.com
Syracuse St, 92508

Letter I-77

Juan Garcia
February 21, 2023

I-77.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: John Viafora <jrviafora@gmail.com>
Sent: Tuesday, February 21, 2023 9:27 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

John Viafora, Indigo Point, 92508

Sent from my iPhone

Letter I-78

John Viafora
February 21, 2023

I-78.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: John Viafora <jrviafora@gmail.com>
Sent: Tuesday, February 21, 2023 9:37 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

John Viafora, Indigo Point, 92508

Sent from my iPhone

Letter I-79

John Viafora
February 21, 2023

I-79.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: John Viafora <jrviafora@gmail.com>
Sent: Tuesday, February 21, 2023 9:53 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
John Viafora, Indigo Point, 92508

Sent from my iPhone

Letter I-80

John Viafora
February 21, 2023

I-80.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: John Viafora <jrviafora@gmail.com>
Sent: Tuesday, February 21, 2023 9:17 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
John Viafora, Indigo Point, 92508

Sent from my iPhone

Letter I-81

John Viafora
February 21, 2023

I-81.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: John Viafora <jrviafora@gmail.com>
Sent: Tuesday, February 21, 2023 9:56 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

John Viafora, Indigo Point, 92508

Sent from my iPhone

Letter I-82

John Viafora
February 21, 2023

I-82.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: John Viafora <jrviafora@gmail.com>
Sent: Tuesday, February 21, 2023 10:02 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

John Viafora, Indigo Point, 92508

Sent from my iPhone

Letter I-83

John Viafora
February 21, 2023

I-83.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: John Viafora <jrviafora@gmail.com>
Sent: Tuesday, February 21, 2023 10:15 AM
To: Dan Fairbanks
Subject: Jobs

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,IVVhynlCoc_sn7-DDce0ZRzhhEhVz4eyJixBTU2AtMqZS6qP7JSY1TRGg1EkVObDuEirqmkRnFCK6lEeXmB7kFW8QIIslu8xbEbeZl2LIbMrVbU,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,U_swePp_c2KKHNnxSFCjvclEk9CWb585aKFcMgNny44Ib-

cD6DaXPjYoEHYGIR0r_C9XOguD3lv9wBQi5c8GYs1puKCLd2-0qc5JhREWu_Y,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

John Viafora, Indigo Point, 92508

Sent from my iPhone

Letter I-84

John Viafora
February 21, 2023

I-84.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: jmccsilver@aol.com
Sent: Tuesday, February 21, 2023 5:29 PM
To: Dan Fairbanks
Subject: West upper plateau project/Riverside

I support the need for an additional artery extending Barton road to Allesandro. Traffic flow on Troutwein is overcrowded and there is a need for an addtional roadway leading up to Allesandro.

I also support the development of a park in this area and believe it will add to the community.

I support the development and completion of this project and I believe the impact on the community will be positive.

I-85.1

Sincerely,

John McCalley
8541 Mill Pond Place
Riverside, CA 92508
email: jmccsilver@aol.com

Letter I-85

John McCalley
February 21, 2023

I-85.1 This comment expresses general support for the Project. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No changes or additions to the project description or analyses included in the Draft EIR are required.

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From: Gayle Dicarlantonio <gayledmail@gmail.com>
Sent: Tuesday, February 21, 2023 8:09 AM
To: Dan Fairbanks

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional

warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

G DiCarlantonio
Kohlberry Ct Riverside
gayledmail@gmail.com

Letter I-86

Gayle DiCarlantonio
February 21, 2023

I-86.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Erin Conlisk <erin.conlisk@gmail.com>
Sent: Tuesday, February 21, 2023 8:34 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

I-87.1

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. Remaining coastal sage habitat is critically important to conserve as it has declined by over 90% since pre-colonial times. I also ask that you survey severely threatened plants like the tarplant during the wet season - this year might be a good candidate year, but please consult the MSHCP - in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I-87.2

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

I-87.3

Thank you for allowing me to provide comments on this project.

Sincerely,
Erin Conlisk, PhD
Ecologist

Letter I-87

Erin Conlisk
February 21, 2023

I-87.1 This comment is the same as Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

I-87.2 This comment notes the importance of coastal sage habitat conservation and suggests that MSHCP consultation regarding conducting requested plant surveys this year. This comment is similar in nature to the comments raised within Form Letter C – Biological Resources, and does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis within the Draft EIR. As such, in response to this comment, please see Form Letter C Response.

I-87.3 This comment is the same as Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Erin Lehman <erin.lehman@rocketmail.com>
Sent: Tuesday, February 21, 2023 12:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Erin Lehman
6039 La Sierra Ave. Riverside, 92505
Erin.lehman@rocketmail.com

Letter I-88

Erin Lehman
February 21, 2023

I-88.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Erin Lehman <erin.lehman@rocketmail.com>
Sent: Tuesday, February 21, 2023 12:52 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

<include name, address, email in signature line>

Sent from my iPhone

Letter I-89

Erin Lehman
February 21, 2023

I-89.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: FRANK ERDODI <honiebun2k@aol.com>
Sent: Tuesday, February 21, 2023 6:55 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Frank and Michelle Erdodi
8548 Jay Ct.
Riverside, CA. 92508
Honiebun2k@aol.com

Sent from my iPad

Letter I-90

Frank Erdodi
February 21, 2023

I-90.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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Letter I-91

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From: Melissa Suarez <melissaims@yahoo.com>
Sent: Tuesday, February 21, 2023 9:15 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Melissa Suarez
Riverside, CA 92508

Letter I-92

Melissa Suarez
February 21, 2023

I-92.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Melissa Suarez <melissaims@yahoo.com>
Sent: Tuesday, February 21, 2023 9:12 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Melissa Suarez
Riverside, CA 92508

Letter I-93

Melissa Suarez
February 21, 2023

I-93.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Melissa Suarez <melissaims@yahoo.com>
Sent: Tuesday, February 21, 2023 9:20 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Melissa Suarez
Riverside, CA 92508

Letter I-94

Melissa Suarez
February 21, 2023

I-94.1 This comment letter is a shortened version of Form Letter G – Traffic. The letter deletes several sentences from the standard form letter. As such, in response to this comment, please see Form Letter G Response.

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From: Melissa Suarez <melissaims@yahoo.com>
Sent: Tuesday, February 21, 2023 9:13 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come.

Sincerely,

Melissa Suarez
Riverside, CA 92508

Letter I-95

Melissa Suarez
February 21, 2023

I-95.1 This comment letter is a slightly modified version of Form Letter A – Aesthetics. This letter removes the last sentence of Form Letter A. These modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter A Response.

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From: Melissa Suarez <melissaims@yahoo.com>
Sent: Tuesday, February 21, 2023 9:17 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Melissa Suarez
Riverside, CA 92508

Letter I-96

Melissa Suarez
February 21, 2023

I-96.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Molly Brooke Becker <mmbrooke@gmail.com>
Sent: Tuesday, February 21, 2023 8:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Molly Brooke Becker
1440 Timberlane Dr, Riverside, CA 92506

mmbrooke@gmail.com

Letter I-97

Molly Brooke Becker
February 21, 2023

I-97.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Molly Brooke Becker <mmbrooke@gmail.com>
Sent: Tuesday, February 21, 2023 8:41 PM
To: Dan Fairbanks

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional

warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Molly Brooke Becker
1440 Timberlane Dr, Riverside, CA 92506
mmbrooke@gmail.com

Letter I-98

Molly Brooke Becker
February 21, 2023

I-98.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Wednesday, February 22, 2023 7:16 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
David Doty 8805 Morninglight Cir. Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-99

David Doty
February 22, 2023

I-99.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Wednesday, February 22, 2023 7:24 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

David Doty 8805 Morninglight Cir. Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-100

David Doty
February 22, 2023

I-100.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Wednesday, February 22, 2023 6:27 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, EIR, State Clearinghouse No.2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,Xf5eneVJnC4QC83A8HmxFRxwKn2WRO8MboYTNqyz3xOIVtITPH00j0fYDwS3xwQ6XWf9zspvGGOB6TJ-ux46wycbswKEsGRRpAuPokHaPjsy1UcO4bel&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,5EiutS9Ax7Roc-

hmfxwnJkgnL_hogWGG2uTXiLeWVZTBk5NMZYrjkwlUAveuakH5BHr42ADOp4rW08KCYv8ugMfA0Jg4K_tSo1HxJcJS0SHF_Nx5&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

David Doty 8805 Morninglight Cir. Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-101

David Doty
February 22, 2023

I-101.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, February 22, 2023 6:27 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Kristy Doty
8805 Morninglight Circle
Riverside, Ca 92508

Dkdoty2@gmail.com

Sent from my iPhone

Letter I-102

Kristy Doty
February 22, 2023

I-102.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, February 22, 2023 6:32 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Kristine Doty
8805 Morninglight Circle
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-103

Kristine Doty
February 22, 2023

I-103.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, February 22, 2023 6:36 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Kristy Doty
8805 Morninglight Circle
Riverside, 93105
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-104

Kristy Doty
February 22, 2023

I-104.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, February 22, 2023 6:25 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Kristy Doty
8805 Morninglight Circle
Riverside, Ca 92508

Sent from my iPhone

Letter I-105

Kristy Doty
February 22, 2023

I-105.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, February 22, 2023 6:38 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Kristy Doty
8805 Morninglight Circle
92508
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-106

Kristy Doty
February 22, 2023

I-106.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, February 22, 2023 6:44 AM
To: Dan Fairbanks
Subject: Upper Meridian Project ERI Comment

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,bMWFiFl99jMzfSpW2ZT81qy1EDqohD8T8JOQO5PSLCIL5emSP06FBu-Ig_TWClZ9TECp4cg80JFtl4UmZNfT6dgrVPZKz42EVBdwxNPnAqHJtSkx-g4Kn4wYSA,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,jW5QdF72JpFKvN7h5qaJ269qa0qybQB9Fv36xiay9LPS6xKMkHkSR-hsSruBhguHUuv9gMVH63BBK0NobKpgtduEw_xnrm3_wiXM5OGMF0HVVzoZc3tq-A,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Kristy Doty
8805 Morninglight Circle
Riverside
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-107

Kristy Doty
February 22, 2023

I-107.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, February 22, 2023 6:46 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Kristy Doty
8805 Morninglight Circle
Riverside, Ca
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-108

Kristy Doty
February 22, 2023

I-108.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, February 22, 2023 9:01 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Kristine Doty
8805 Morninglight Circle
Riverside
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-109

Kristine Doty
February 22, 2023

I-109.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: mark calhoun <markcalhoun39@gmail.com>
Sent: Wednesday, February 22, 2023 7:58 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Mark Calhoun
20576 Azalea Terrace Rd
Riverside 92508
markcalhoun39@gmail.com

Letter I-110

Mark Calhoun
February 22, 2023

I-110.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: mark calhoun <markcalhoun39@gmail.com>
Sent: Wednesday, February 22, 2023 7:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Mark Calhoun
20576 Azalea Terrace Rd
Riverside 92508
markcalhoun39@gmail.com

Letter I-111

Mark Calhoun
February 22, 2023

I-111.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: mark calhoun <markcalhoun39@gmail.com>
Sent: Wednesday, February 22, 2023 8:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Mark Calhoun
20576 Azalea Terrace Rd
Riverside 92508
markcalhoun39@gmail.com

Letter I-112

Mark Calhoun
February 22, 2023

I-112.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: mark calhoun <markcalhoun39@gmail.com>
Sent: Wednesday, February 22, 2023 7:57 PM
To: Dan Fairbanks

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional

warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Mark Calhoun
20576 Azalea Terrace Rd
Riverside 92508
markcalhoun39@gmail.com

Letter I-113

Mark Calhoun
February 22, 2023

I-113.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: mark calhoun <markcalhoun39@gmail.com>
Sent: Wednesday, February 22, 2023 8:01 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Mark Calhoun
20576 Azalea Terrace Rd
Riverside 92508
markcalhoun39@gmail.com

Letter I-114

Mark Calhoun
February 22, 2023

I-114.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: mark calhoun <markcalhoun39@gmail.com>
Sent: Wednesday, February 22, 2023 8:02 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Mark Calhoun
20576 Azalea Terrace Rd

Riverside 92508
markcalhoun39@gmail.com

Letter I-115

Mark Calhoun
February 22, 2023

I-115.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: mark calhoun <markcalhoun39@gmail.com>
Sent: Wednesday, February 22, 2023 8:03 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Mark Calhoun
20576 Azalea Terrace Rd
Riverside 92508
markcalhoun39@gmail.com

Letter I-116

Mark Calhoun
February 22, 2023

I-116.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Beth West <westb2790@gmail.com>
Sent: Wednesday, February 22, 2023 7:58 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Beth West
3542 Castle Reagh Pl,
Riverside CA 92506
bawest2790@yahoo.com

Sent from my iPhone

Letter I-117

Beth West
February 22, 2023

I-117.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Danielle Jungmann-Weems <deejwee@icloud.com>
Sent: Wednesday, February 22, 2023 8:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
DJ Weems
2171 Gainsborough Dr
Riverside, CA. 92506

Letter I-118

DJ Weems
February 22, 2023

I-118.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Danielle Jungmann-Weems <deejwee@icloud.com>
Sent: Wednesday, February 22, 2023 8:45 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

DJ Weems
2171 Gainsborough Dr
Riverside, CA. 92506
Djweems@gmail.com

Letter I-119

DJ Weems
February 22, 2023

I-119.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Danielle Jungmann-Weems <deejwee@icloud.com>
Sent: Wednesday, February 22, 2023 8:45 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,
DJ Weems
2171 Gainsborough Dr
Riverside, CA. 92506
Djweems@gmail.com

Letter I-120

DJ Weems
February 22, 2023

I-120.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Danielle Jungmann-Weems <deejwee@icloud.com>
Sent: Wednesday, February 22, 2023 8:42 AM
To: Dan Fairbanks
Subject: Opposition

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,X4dOayCMVlfvNej0Zaf_oz26sTx2OBzJ9XI474D0qP0_PWC7X962tCfZgBn_YClMp1jqwCE3fSrlmISE7KyWnqsZqNL-4VLtjTYn0wrIeGJAWXmiLlA,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,5IKvoDGJOmyzTVgPYrZJWrN8ruApFay9kYzOzC_NK-oIg7GpcLwCKoWSne6KuX-

F6FkPMi_3yN61tdvdskwr5GikCcNP7aul3cI776YYhpbGr0fu56Lcjrm-DA,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
DJ Weems
2171 Gainsborough Dr
Riverside, CA. 92506

Letter I-121

DJ Weems
February 22, 2023

I-121.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Danielle Jungmann-Weems <deejwee@icloud.com>
Sent: Wednesday, February 22, 2023 8:46 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

DJ Weems
2171 Gainsborough Dr
Riverside, CA. 92506
Djweems@gmail.com

Letter I-122

DJ Weems
February 22, 2023

I-122.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Danielle Jungmann-Weems <deejwee@icloud.com>
Sent: Wednesday, February 22, 2023 8:46 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

DJ Weems

2171 Gainsborough Dr
Riverside, CA. 92506
Djweems@gmail.com

Letter I-123

DJ Weems
February 22, 2023

I-123.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

INTENTIONALLY LEFT BLANK

From: Danielle Jungmann-Weems <deejwee@icloud.com>
Sent: Wednesday, February 22, 2023 8:46 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

DJ Weems
2171 Gainsborough Dr
Riverside, CA. 92506
Djweems@gmail.com

Letter I-124

DJ Weems
February 22, 2023

I-124.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

INTENTIONALLY LEFT BLANK

From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, February 23, 2023 5:58 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

David Doty 8805 Morninglight Cir Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-125

David Doty
February 23, 2023

I-125.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, February 23, 2023 6:03 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

David Doty 8805 Morninglight Cir Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-126

David Doty
February 23, 2023

I-126.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, February 23, 2023 6:26 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
David Doty 8805 Morninglight Cir Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-127

David Doty
February 23, 2023

I-127.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, February 23, 2023 6:38 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

David Doty 8805 Morninglight Cir Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-128

David Doty
February 23, 2023

I-128.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Thursday, February 23, 2023 6:25 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Kristy Doty
8805 Morninglight Circle
Riverside 92508
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-129

Kristy Doty
February 23, 2023

I-129.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

INTENTIONALLY LEFT BLANK

From: K Doty <dkdoty2@gmail.com>
Sent: Thursday, February 23, 2023 6:27 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Kristy Doty
8805 Morninglight Circle
Riverside 92508
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-130

Kristy Doty
February 23, 2023

I-130.1 This comment letter is a duplicate of Letter I-129 and is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Thursday, February 23, 2023 6:28 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

K Doty
8805 Morninglight Circle
Riverside 92508
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-131

K Doty
February 23, 2023

I-131.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: K Doty <dkdoty2@gmail.com>
Sent: Thursday, February 23, 2023 6:29 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Best,
Kristy Doty
8805 Morninglight Circle
Riverside 92508
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-132

Kristy Doty
February 23, 2023

I-132.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Nicolette Rohr <nicolette.rohr@gmail.com>
Sent: Thursday, February 23, 2023 9:37 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Nicolette Rohr
Riverside, CA. 92506

Letter I-133

Nicolette Rohr
February 23, 2023

I-133.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Richard Stalder <xcoachrs@sbcglobal.net>
Sent: Thursday, February 23, 2023 3:37 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Richard Stalder
3732 Beechwood Place
Riverside, CA 92506

<include name, address, email in signature line>

Sent from my iPhone

Letter I-134

Richard Stalder
February 23, 2023

I-134.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Richard Stalder <xcoachrs@sbcglobal.net>
Sent: Thursday, February 23, 2023 3:42 PM
To: Dan Fairbanks

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,hCr3kwIkdkpdmIdyf6A2gTTZC5SwpG1ZPKscdb38a_YFceUyinPdWzxPJ2uuCMTNlZZEgdbpDySR64rtXVQM2k9YowAlZA7bFTA-s1umOw,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,BKiGa9KotU5kl9mHPMdKvwfo8jq8IugnOQq6RKE4HDV2TSlaYgyEquwU441VLEKWziGftzuPevJhvzMR2fTxP9QnF4UDOUt9sek-99yf3I_FfJfXvdg72g46&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed

people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
Richard Stalder
3732 Beechwood Place
Riverside, CA 92506
xcoachrs@sbcglobal.net
<include name, address, email in signature line>

Sent from my iPhone

Letter I-135

Richard Stalder
February 23, 2023

I-135.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Tom Parkinson <cc88kp92@icloud.com>
Sent: Thursday, February 23, 2023 10:25 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

I-136.1

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-136.1 Cont.

Thank you for letting me comment on your project.

Sincerely,

<Orangecrest Resident for 28 years. 20646 Gelman dr. This area was once an all American community. A piece of the American Dream. Now no longer a place to dream. We have paid our dues, if this project goes forward, that will kill off our last remaining open space. Please reconsider the project. Maybe a world class sports park, anything other than more concrete tombs. Sincerely Tom Parkinson.

I-136.2

Sent from my iPhone

Letter I-136

Tom Parkinson
February 23, 2023

I-136.1 This comment is the same as Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-136.2 This comment expresses general opposition to the Project and concern about open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. No specific issues, questions or concerns about the environmental analysis in the Draft EIR are raised in this comment. As such, no further response is provided.

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From: McCreary, Crystal <cmccreary2@student.rccd.edu>
Sent: Friday, February 24, 2023 12:46 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Crystal McCreary
Resident of Riverside
20394 Little Julies Way
Riverside, CA 92507
cmccreary2@student.rccd.edu

Letter I-137

Crystal McCreary
February 24, 2023

I-137.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: McCreary, Crystal <cmccreary2@student.rccd.edu>
Sent: Friday, February 24, 2023 12:46 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Crystal McCreary
Resident of Riverside
20394 Little Julies Way
Riverside, CA 92507
cmccreary2@student.rccd.edu

Letter I-138

Crystal McCreary
February 24, 2023

I-138.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: McCreary, Crystal <cmccreary2@student.rccd.edu>
Sent: Friday, February 24, 2023 12:47 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Crystal McCreary
Resident of Riverside
20394 Little Julies Way
Riverside, CA 92507
cmccreary2@student.rccd.edu

Letter I-139

Crystal McCreary
February 24, 2023

I-139.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: McCreary, Crystal <cmccreary2@student.rccd.edu>
Sent: Friday, February 24, 2023 12:47 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Crystal McCreary
Resident of Riverside
20394 Little Julies Way
Riverside, CA 92507
cmccreary2@student.rccd.edu

Letter I-140

Crystal McCreary
February 24, 2023

I-140.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: McCreary, Crystal <cmccreary2@student.rccd.edu>
Sent: Friday, February 24, 2023 12:47 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Crystal McCreary
Resident of Riverside

20394 Little Julies Way
Riverside, CA 92507
cmccreary2@student.rccd.edu

Letter I-141

Crystal McCreary
February 24, 2023

I-141.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: McCreary, Crystal <cmccreary2@student.rccd.edu>
Sent: Friday, February 24, 2023 12:48 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Crystal McCreary
Resident of Riverside

20394 Little Julies Way
Riverside, CA 92507
cmccreary2@student.rccd.edu

Letter I-142

Crystal McCreary
February 24, 2023

I-142.1 This comment letter is the same as Letter I-141 and is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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Letter I-143

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Letter I-144

[NOT USED]

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From: McCreary, Crystal <cmccreary2@student.rccd.edu>
Sent: Friday, February 24, 2023 12:48 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Crystal McCreary
Resident of Riverside
20394 Little Julies Way
Riverside, CA 92507
cmccreary2@student.rccd.edu

Letter I-145

Crystal McCreary
February 24, 2023

I-145.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: McCreary, Crystal <cmccreary2@student.rccd.edu>
Sent: Friday, February 24, 2023 12:45 PM
To: Dan Fairbanks

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional

warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Crystal McCreary
Resident of Riverside
20394 Little Julies Way
Riverside, CA 92507
cmccreary2@student.rccd.edu

Letter I-146

Crystal McCreary
February 24, 2023

I-146.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on

the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics is misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents like myself.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Natalie Gravitt

19931 Caraway Ln

Riverside CA 92508

Gravittnatalie28@gmail.com

Letter I-147

Natalie Gravitt
February 24, 2023

I-147.1 This comment letter is Form Letter A – Aesthetics with non-substantive text edits, which do not raise any new or different issues. As such, in response to this comment, please see Form Letter A Response.

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From: Nicolette Rohr <nicolette.rohr@gmail.com>
Sent: Friday, February 24, 2023 8:49 PM
To: Dan Fairbanks
Subject: Comment on MJPA Draft EIR

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project.

The proposed project would add new warehouses in close proximity to homes and recreation areas - places where people work and play! Yet, the draft EIR does not properly analyze the project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives, which have been consistently requested by the community. I-148.1

The justification for this widely opposed project appears to be the creation of 2,600 jobs. However, there is not enough information on these jobs. Where did the number originate? What kinds of jobs will they be? How much will they pay? Will they be temporary jobs? As we have seen in this region, warehouse jobs are often touted as a positive, but they are seldom good jobs. Why trade our natural environment and community health for low-wage, unstable jobs which may soon disappear anyway? The Greenhouse Gas (GHG) section claims the development will have a net positive effect because local community members will have less of a commute driving to work. But who could afford rents in the surrounding neighborhoods with the temporary, part-time, low-paying work that most warehouses provide? I-148.2

Warehouses are not new to our region and we have seen their environmental impact and their social impact as well. The claims about jobs need more detail and justifications.

Sincerely,

Nicolette Rohr
Riverside, 92506
nicolette.rohr@gmail.com

Letter I-148

Nicolette Rohr
February 24, 2023

I-148.1 This comment generally challenges the environmental analysis in the Draft EIR but does not raise specific issues or concerns regarding land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing. This comment requests evaluation of a non-industrial alternative. See Topical Response 8 - Alternatives, for the evaluation of Alternative 5 – Non-Industrial Alternative.

I-148.2 This comment is a truncated version of Form Letter F – Jobs. This comment does not raise any new or different issues than those raised within Form Letter F. As such, in response to this comment, please see Form Letter F Response.

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From: Nicolette Rohr <nicolette.rohr@gmail.com>
Sent: Friday, February 24, 2023 8:57 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. This alone should give pause. Additionally, there is reason to believe it is an underestimate of the air quality impacts. The analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the construction phase of this project. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. I ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. I-149.1

I would also like to raise the issue of the responsibility to mitigate significant impacts on the surrounding community as possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered for this site?

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community.

Finally, I ask that the March JPA share a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. We need more information and accountability given the significant threat to our communities and the very air we breathe.

Sincerely,

Nicolette Rohr
Riverside, CA. 92506
nicolette.rohr@gmail.com

Letter I-149

Nicolette Rohr
February 24, 2023

I-149.1 This comment letter is an abbreviated version of Form Letter B – Air Quality. This comment letter does not raise any new or different issues than those raised within Form Letter B. As such, in response to this comment, please see Form Letter B Response.

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From: Nicolette Rohr <nicolette.rohr@gmail.com>
Sent: Friday, February 24, 2023 9:01 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you again for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project. The draft EIR does not properly analyze the project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections.

I have serious concerns about the shrinking of our open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Given that the plant survey was conducted in a drought year, more information about the impact is needed. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine and share what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

I-150.1

Sincerely,
Nicolette Rohr
Riverside, CA. 92506
nicolette.rohr@gmail.com

Letter I-150

Nicolette Rohr
February 24, 2023

I-150.1 This comment letter is an abbreviated version of Form Letter C – Biological Resources. This comment letter does not raise any new or different issues than those raised within Form Letter C. As such, in response to this comment, please see Form Letter C Response.

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From: Nicolette Rohr <nicolette.rohr@gmail.com>
Sent: Friday, February 24, 2023 9:08 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities, but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses. Appendix B and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of warehouse buildings will mar the land and views. How would warehouses not change the aesthetic? How does the developer justify the impacts as "less than significant"? And does the March JPA simply take the developer's word for it? Surely the residents of the surrounding neighborhoods will notice the changes aesthetic?

The construction of mega-warehouses will also have effects on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts identified will also negatively impact the daily lives of residents. I-151.1

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. This draft EIR and plan to build more warehouses on the West Campus Upper Plateau does not do that. The March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no aesthetic beauty or value to the people who live, play, and pray on this land. Minimal low-paying jobs in exchange for destroying a public recreation area does not serve the community.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this guiding document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Nicolette Rohr
Riverside, CA. 92506
nicolette.rohr@gmail.com

Letter I-151

Nicolette Rohr
February 24, 2023

I-151.1 This comment letter is an abbreviated version of Form Letter A – Aesthetics. This comment letter does not raise any new or different issues than those raised within Form Letter A. As such, in response to this comment, please see Form Letter A Response.

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From: aramjim09@gmail.com
Sent: Saturday, February 25, 2023 7:46 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Ana Ramirez
92508

Sent from my iPhone

Letter I-152

Ana Ramirez
February 25, 2023

I-152.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: aramjim09@gmail.com
Sent: Saturday, February 25, 2023 7:52 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Ana Ramirez

8084 La Crosse Way, Riverside CA 92508
Aramjim09@gmail.com

Sent from my iPhone

Letter I-153

Ana Ramirez
February 25, 2023

I-153.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: aramjim09@gmail.com
Sent: Saturday, February 25, 2023 7:52 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Ana Ramirez
8084 La Crosse Way, Riverside CA 92508
Aramjim09@gmail.com

Sent from my iPhone

Letter I-154

Ana Ramirez
February 25, 2023

I-154.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: aramjim09@gmail.com
Sent: Saturday, February 25, 2023 7:52 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Ana Ramirez
8084 La Crosse Way, Riverside CA 92508
Aramjim09@gmail.com

Sent from my iPhone

Letter I-155

Ana Ramirez
February 25, 2023

I-155.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: aramjim09@gmail.com
Sent: Saturday, February 25, 2023 7:53 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Ana Ramirez
8084 La Crosse Way, Riverside CA 92508
Aramjim09@gmail.com

Sent from my iPhone

Letter I-156

Ana Ramirez
February 25, 2023

I-156.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: aramjim09@gmail.com
Sent: Saturday, February 25, 2023 7:53 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Ana Ramirez
8084 La Crosse Way, Riverside CA 92508
Aramjim09@gmail.com

Sent from my iPhone

Letter I-157

Ana Ramirez
February 25, 2023

I-157.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: aramjim09@gmail.com
Sent: Saturday, February 25, 2023 7:54 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,NEX8YY4zJJiDRH3JiZtUBClgVZRmm3WnB6pTOt4vrva7NptbgcH2fiI5K32BUMR4XWGwWH8aJa9jkDnbs5r3AuKE4hFmA0G_jMr1aNbx&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone

(https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,qEd3PftIfGLg4ddeplTPKYDzeyR2ta-5nRcJICLh_6SiN0Oo4spig3fNOnz4kYj2uCflQt6cSP6V-f4bccS7Q6ibvYiL0K1NNrFJieEHtefF2Z_ABZSxng,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Ana Ramirez
8084 La Crosse Way, Riverside CA 92508
Aramjim09@gmail.com

Sent from my iPhone

Letter I-158

Ana Ramirez
February 25, 2023

I-158.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Mary Viafora <mlviafora@gmail.com>
Sent: Saturday, February 25, 2023 10:50 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a church preschool and youth outdoor sports, the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Mary Viafora
20828 Indigo Point

Riverside, CA 92508

Sent from my iPhone

Letter I-159

Mary Viafora
February 25, 2023

I-159.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Vicki Broach <vbroach55@gmail.com>
Sent: Saturday, February 25, 2023 11:51 AM
To: Dan Fairbanks
Subject: Vicki L. Broach's Comments on Draft EIR for West Campus Upper Plateau
Attachments: broachcommentletterdraftEIR.docx; Untitled attachment 00008.txt

Mr. Fairbanks,

Please accept the attached comments on the Draft EIR for the West Campus Upper Plateau as proposed to the March JPA. I-160.1

Cordially,

Vicki L. Broach

February 25, 2023

Vicki L. Broach, Esq.
6385 Merlin Drive
Riverside, CA 92506
vbroach55@gmail.com
(951) 907-3948

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As a Riverside resident for the past 30 years, I am writing to submit comments on the draft Environmental Impact Report (EIR) for the proposed West Campus Upper Plateau. I am a former staff attorney for the state Court of Appeal and I have 20 years of experience conducting appellate review of CEQA cases. I have deep concerns regarding elements of the proposed project and its myriad environmental impacts, including air quality, greenhouse gas emissions, land use and planning, housing, and transportation, as well as the developer's questionable claims about job creation.

It is also my professional view that the EIR in its present draft form would be vulnerable to unfavorable review by the Superior Court and the Court of Appeal. The draft EIR does not properly analyze the Project's air quality, health risks, greenhouse gas emissions, land use, housing, and traffic. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I-160.2

- Air quality impacts

It is undisputed that Riverside County has some of the worst air quality of any region of the United States. The Draft EIR acknowledges that there will be "significant and unavoidable" impacts to an area of the City and County that already bears an undue burden of pollution. Within five kilometers of the proposed building site, there are already 45 million square feet of warehouses, generating over 30,000 truck trips, and spewing over 40 pounds of Diesel Particulate Matter into the air daily. This does not include the other proposed warehouses in the immediate vicinity, including the one at the Sycamore Canyon site, that have already been approved. Given that Diesel PM accounts for 70% of cancers attributable to toxic air contaminants, local residents are legitimately worried about the threatened health effects for themselves, their families, and their community.

I-160.3

I-160.4

I-160.5

- Land Use and Planning, Population and Housing

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses. The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is community feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for "Industrial/Warehousing" uses and it explicitly shows "Industrial/warehousing" land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated: "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located

I-160.6

therein….b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space….d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred."

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to "upzone" the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-160.6 Cont.

Finally, with regard to the housing element, the Draft EIR acknowledges the City of Riverside is mandated by state law to provide adequate housing but fails to recognize the City is failing to meet its state-mandated goals for any of four categories of housing ranging from very-low income to above-moderate income, with very-low income housing being wholly inadequate. The City's overall compliance has been rated as "D" on a scale of "A-F". Similarly, the cities of Perris and Moreno Valley and the unincorporated areas of Riverside County have been rated "D+". Nevertheless, the Draft EIR rather blithely suggests that no new housing will be needed because the employees can be housed in the surrounding communities even though there is little such current availability. The EIR should be corrected to reflect honestly the actual challenges presented by increasing the number of employees in an area that already lacks sufficient housing for its citizens.

I-160.7

- <u>Transportation</u>

In its present form, the Draft EIR is deficient in its traffic analysis. The analysis does not account for the 215/60 freeway corridor, which is within one mile of the site and would necessarily be the route the trucks would use. As those who regularly travel that route can attest, the 215/60 is already overburdened with truck traffic. When traveling northbound on the 215 and approaching Van Buren, drivers almost invariably encounter a bottleneck of

I-160.8

truck traffic. There are also no viable or legal alternative routes on adjacent arterial streets. The City of Riverside is already struggling to cope with truck traffic illegally using its arterial streets. Not only does it interfere with daily commuting but the additional heavy truck traffic creates safety hazards and additional wear and tear on City roads and residents' vehicles. Furthermore, the overtaxed City and County police and sheriff are tasked with ticketing and enforcing the approved routes, burdening local jurisdictions with the cost of both enforcement and maintenance.

I-160.8 Cont.

The Final EIR should include consultation with CalTrans as part of its traffic analysis of the 215/60 corridor to reflect the reality of the impact of the project on the local area. The Final EIR should also include a plan for enforcement and maintenance that does not shift the burden to local jurisdictions and includes mitigation measures requiring the tenants to pay an infrastructure fee to local jurisdictions for the cost to our roads and to our police forces.

I-160.9

I-160.10

- <u>Job creation claims</u>

The claims about job creation are dubious. According to local news reports, most logistics jobs–truck drivers and warehouse workers–will be replaced by automation in the next 25 years. And the lost jobs will not have been particularly lucrative for the employees. According to the Southern California Association of Governments Economic Report (SCAG) for December 2022: "In 2001, GDP per capita in Riverside County and San Bernardino County were 64 percent and 69 percent of U.S. per capita GDP, respectively. When compared to the rest of California, the ratios are worse: 52 percent and 56 percent.... Moreover, by 2022, **Riverside County's position had deteriorated to a per capita GDP of only 59 percent of the U.S. level and 40 percent of California**.... **These numbers are alarming, especially given the success of the Logistics Industry. ...**It also explains why the **Inland Empire's per capita GDP has sunk to a rank of 340 out of 386 MSAs,** despite being the twelfth largest by population count." (Emphasis added.) Job growth in the Inland Empire since 2001 has resulted in numerous jobs but they tend to be relatively lower paying compared to other parts of the state and nation.

I-160.11

In other words, in spite of the low unemployment rate, the economic outlook is worse than it was before the explosion of the logistics industry. The same SCAG report discusses how the logistics industry "will likely go through a transformation as advances in automation and artificial intelligence displace workers." It warns: "There will be further costs from the expansion of the Logistics Sector if the result of the expansion means that **there will be less industrial space available in the future for industries which are able to add more value to the economy per square foot.**" (emphasis added)

I-160.12

Furthermore, the vast majority of companies purchasing warehouses are not local but are mostly from Orange County or outside California. 80% of the warehouses in Riverside County are owned by businesses with mailing addresses outside the region. For instance, more warehouse square footage in the Inland Empire is owned by businesses in Dallas, TX and Denver, CO than Riverside. So, we pay the costs of goods moving through Riverside

I-160.13

County in terms of air quality and traffic but the wealth from this industry is not benefitting our local economy.

I-160.13 Cont.

In conclusion, the Draft EIR is legally insufficient for multiple reasons. The proposed development does not serve the goals of health, well-being, and long-term economic growth for this community. Considering the significant impacts that cannot reasonably be mitigated and the minimal economic benefit created by the proposed development, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. Please encourage the developer to consider non-industrial, alternative uses of the land for the sake of all Riverside city and county residents, as well those living adjacent to the site.

I-160.14

I-160.15

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

I-160.16

Sincerely,

Vicki L. Broach, Esq.

Letter I-160

Vicki Broach
February 25, 2023

I-160.1 This comment refers to attached comments on the Draft EIR and does not raise any specific issues, questions or concerns about the environmental analysis in the Draft EIR. As such, no further response is provided.

I-160.2 This comment generally challenges the environmental analysis in the Draft EIR but does not raise specific issues or concerns regarding land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing. This comment requests evaluation of a non-industrial alternative. See Topical Response 8 - Alternatives, for the evaluation of Alternative 5 – Non-Industrial Alternative.

I-160.3 This comment discusses the Project's significant and unavoidable air quality impacts and air emissions associated with diesel particulate matter (DPM) and notes the region's poor air quality. The analysis included in Recirculated Section 4.2, Air Quality, as well as included within Appendix C-1, Revised Air Quality Impact Analysis, and Appendix C-2, Revised Health Risk Assessment Technical Report, discusses Project impacts related to air quality and health risks from DPM. Recirculated Section 4.2, Air Quality, also incorporates additional air quality mitigation measures. The existing warehouses mentioned in the comment are included in the baseline as appropriate for the impact areas analyzed in the Draft EIR.

I-160.4 This comment identifies the Sycamore Canyon site and other proposed warehouses in the immediate vicinity of the Project site. Table 4-2 of the EIR lists the cumulative projects included in the environmental analysis. The Sycamore Hills Distribution Center, north of the Project site and adjacent to Sycamore Canyon, is included.

I-160.5 This comment raises concerns about the health effects related to DPM. Recirculated Section 4.2, Air Quality, and Appendix C-2 assess the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks.

I-160.6 This comment is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-160.7 This comment states that the Draft EIR should be corrected to reflect that the City of Riverside is failing to meet its state mandated housing goals and that there is a lack of sufficient housing. Section 4.12, Population and Housing, of the Draft EIR analyzed whether the Project would induce substantial unplanned population growth either directly or indirectly. Based on the County unemployment rate, the EIR assumed the employee will be filled by existing residents and provides substantial evidence for this assumption because the anticipated number of jobs would be a nominal addition to the existing and projected labor force. The Project is consistent with growth projections. See also, Topical Response 5 - Jobs, for additional discussion regarding unemployment rates.

Since 1969, the State of California has required all local governments to adequately plan to meet the housing needs of everyone in the community. California's local governments meet this requirement by adopting housing plans as part of their General Plan.

The California Department of Housing and Community Development (HCD) is required to prepare a Regional Housing Needs Assessment (RHNA) for each Council of Governments in the State that identifies projected housing units needed for all economic segments based on Department of Finance population estimates. The Southern California Association of Governments (SCAG) is the Council of Governments for Riverside County (as well as Ventura, Los Angeles, Orange, San Bernardino, and Imperial Counties) and allocates to the six counties and 191 cities their fair share of the total RHNA housing needed for each income category. Each local government must demonstrate that it has planned to accommodate all of its regional housing need allocation in its Housing Element.

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the regional growth. Failure to do so has consequences for jurisdictions that are deemed non-compliant. HCD is authorized to review any action or failure to act by a local government that it determines is inconsistent with an adopted housing element or housing element law. This includes failure to implement program actions included in the housing element. HCD may revoke housing element compliance if the local government's actions do not comply with state law. Examples of penalties and consequences of housing element noncompliance:

- General Plan Inadequacy: The housing element is a mandatory element of the General Plan. When a jurisdiction's housing element is found to be out of compliance, its General Plan could

be found inadequate, and therefore invalid. Local governments with an invalid General Plan can no longer make permitting decisions.

- Legal Suits and Attorney Fees Local governments with noncompliant housing elements are vulnerable to litigation from housing rights' organization, developers, and HCD. If a jurisdiction faces a court action stemming from its lack of compliance and either loses or settles the case, it often must pay substantial attorney fees to the plaintiff's attorneys in addition to the fees paid by its own attorneys. Potential consequences of lawsuits include: mandatory compliance within 120 days, suspension of local control on building matters, and court approval of housing developments.
- Loss of Permitting Authority: Courts have authority to take local government residential and nonresidential permit authority to bring the jurisdiction's General Plan and housing element into substantial compliance with State law. The court may suspend the locality's authority to issue building permits or grant zoning changes, variances, or subdivision map approvals – giving local governments a strong incentive to bring its housing element into compliance.
- Financial Penalties: Court-issued judgment directing the jurisdictions to bring its housing element in substantial compliance with state housing element law. If a jurisdiction's housing element continues to be found out of compliance, courts can multiply financial penalties by a factor of six.
- Court Receivership: Courts may appoint an agent with all powers necessary to remedy identified housing element deficiencies and bring the jurisdiction's housing element into substantial compliance with housing element law.

As such, it is in the City of Riverside's best interest to have an HCD-compliant and approved Housing Element as expeditiously as possible. Neither March JPA nor the Project applicant have the power or authority to force the City of Riverside to come into compliance with state laws. Additionally, the City of Riverside would not be the only source of housing as the cities of Moreno Valley and Perris and the unincorporated Riverside County are in the vicinity of the Project.

I-160.8 This comment raises the same issues included within Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-160.9 This comment states that the Final EIR should include consultation with Caltrans as part of the traffic analysis of the 215/60 corridor. In response to this comment, please see Form Letter G Response.

I-160.10 This comment states that the Final EIR should include a plan for enforcement and maintenance that does not shift the burden to local jurisdictions and includes mitigation measures requiring the tenants to pay an infrastructure fee to local jurisdictions for the cost to our roads and to our police forces. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although

Project Design Features are already part of the Project, they will also be included as separate conditions of approval. And included in the MMRP March JPA shall monitor compliance through the MMRP.

I-160.11 This comment discusses general job trends in the Inland Empire and does not raise any specific issues, questions or concerns about the Project or the environmental analysis in the Draft EIR. Regarding automation, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. However, to further understand the job estimates for the Project, please see Topical Response 5 – Jobs.

I-160.12 This comment discusses the future automation of the logistics industry and the impact that would have on the economy. Regarding automation, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. The comment does not raise any specific issues, questions or concerns about the environmental analysis in the Draft EIR. As such, no further response is provided.

I-160.13 This comment discusses warehouse ownership. The comment does not raise any specific issues, questions or concerns about the environmental analysis in the Draft EIR. As such, no further response is provided.

I-160.14 This comment conveys general opposition to the Project. The comment does not raise any specific issues, questions or concerns about the environmental analysis in the Draft EIR. As such, no further response is provided.

I-160.15 This comment asks March JPA to urge the developer to consider non-industrial alternative uses of the land. In response to this comment, please see Topical Response 8 – Alternatives, for the analysis and evaluation of Alternative 5, Non-Industrial Alternative.

I-160.16 This comment is a conclusion to the letter and does not raise any specific issues, questions or concerns about the environmental analysis in the Draft EIR. As such, no further response is provided.

From: Araceli Anaya <chely.ana69@gmail.com>
Sent: Sunday, February 26, 2023 4:41 PM
To: Dan Fairbanks
Cc: Araceli Anaya
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

I-161.1

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

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

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing

warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? I-161.1 Cont.

There is already nearby construction of warehouses, such as the ones on Coyote, Van Buren, and Meridian. This current traffic, combined with more traffic from this project will push the capacity of these streets to their limit. I-161.2

When looking at this project, you must take into account possible truck accidents. For example, if there is an accident on Van Buren, then people have to take the little residential streets to get past it. Also, more trucks on Van Buren and Meridian will **disturb funeral processions,** which mainly take these routes to get to the cemetery. Will family members have to traverse through truck traffic in order to lay their loved ones to rest? I-161.3 I-161.4

The Orangecrest and Mission Grove streets are only suited for the people who live here. It is ***not*** possible for these streets to expand in order to accommodate increased industrial traffic. The recent additions of warehouses and their trucks are already creating havoc on these streets, ***especially*** in the morning and afternoon when parents are dropping off and picking up their kids at the schools (there are ***several*** spread out in the community), and people are coming to and from work! Therefore, this new project is not in the best interest of the community. I-161.5

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Araceli Anaya,
92508,
X Araceli Anaya <chely.ana69@gmail.com>

Letter I-161

Araceli Anaya
February 26, 2023

I-161.1 This comment is the same as Form Letter G – Traffic. As such, in response to this comment, please see Form Letter Response G.

I-161.2 This comment expresses concern regarding existing traffic combined with anticipated Project traffic. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

I-161.3 This comment requests that the Draft EIR analyze traffic impacts from truck accidents. Traffic congestion, including congestion due to accidents, is not an impact under CEQA. The Draft EIR analyzed Project transportation hazards impacts under Threshold TRA-3 in Section 4.15, Transportation, and determined with the implementation of PDF-TRA-1 (Roadway Improvements for Site Access), MM-TRA-1 (Construction Traffic Management Plan), and MM-TRA-2 (Traffic Safety Plan for Barton Street), Project impacts would be less than significant. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-161.4 This comment raises concerns regarding disturbance of funeral processions by Project truck traffic. This comment does not raise any specific environmental issue or concerns about the environmental analysis in the Draft EIR. Primary access to the Project site would be via Cactus Avenue. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past Meridian Parkway. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes, which includes Meridian Parkway and Van Buren Boulevard. Exhibit 4-1 of the Project Traffic Analysis (Appendix N-2) shows approximately 10% of the Project's trucks utilizing Meridian Parkway to access the Van Buren Boulevard I-215 ramps.

I-161.5 This comment discusses existing truck traffic on Orangecrest and Mission Grove streets. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the

MMRP. March JPA will monitor compliance through the MMRP. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

From: The Harvilla Family <harvilla4@msn.com>
Sent: Sunday, February 26, 2023 9:58 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: West Campus Upper Plateau, EIR, State Clearinghouse No. 2021110304 - Comments on Aesthetic/Visual Impacts
Attachments: Upper Plateau in Winter.jpg

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would construct over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses will be located within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. I-162.1

The Draft EIR does not properly analyze the Project's aesthetic/visual impacts. The viewpoints in *Section 4.1 Aesthetics* do not adequately show the beauty of the existing land during the winter and springtime. The existing viewpoints in the EIR were photographed during the driest time of the year, and are not representative of the area. Please provide additional renderings using photos taken in the winter and springtime, when the land is completely green (with wildflowers), and with snow on the mountains, similar to the attached picture. I-162.2 The EIR is also missing viewpoints from the west side of the plateau looking east. Please provide these as well (including winter/springtime), for the residents residing on La Crosse Way and Lomond Drive. Please provide viewpoints located near the warehouses to show the community that the mountains will be completely obscured when the viewer is near the warehouses. I-162.3

Also, the viewpoints show mature trees next to the proposed warehouses. Please show the trees in their correct sizes when newly planted, at five years, and at maturity for all viewpoints (including winter/springtime). I-162.4

Even after mitigation, these impacts **will still be significant**, not less than significant as stated in the EIR. The loss of these pristine viewpoints alone is reason enough to cancel this project. I-162.5

Please let me know that you have received this email.

Sincerely,

George Harvilla
8736 Desert Rock Lane
Riverside, CA 92508



I-162.6

Letter I-162

George Harvilla
February 26, 2023

I-162.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 SF of warehouse use, 528,951 SF of office use, and 160,921 SF of retail use. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-162.2 This comment asserts the viewpoint figures used in the Draft EIR (Figures 4.1-3 through 4.1-7) are not representative of the existing condition and requests additional visual simulations to show the Project site's existing conditions during the winter and springtime. However, regardless of the season, the Draft EIR analyzes the Project's potential impacts to scenic resources in relation to height and massing, for example, and the Project's potential to conceal and/or obstruct specified views. The Project's effects on viewpoints during other seasons would not change the Draft EIR's impact determination on scenic vistas or visual character. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. CEQA Guidelines §15204(a). The evaluation within the Draft EIR provides a good faith effort in disclosing the potential impacts on scenic vistas and visual character. When responding to comments, lead agencies need only respond to significant environmental issues and are not required to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. *Id.*

I-162.3 This comment requests the Draft EIR provide viewpoints from the west side of the Project site looking east and viewpoints within the Project site. Public views of the Project site from the west side are obscured by existing residences, including along La Crosse Way and Lomond Drive. As such, visual simulations from such public vantage points would not show the Project. Viewpoints within the Project site would not demonstrate the Project's aesthetic impacts on the surrounding area. As discussed in Response I-162.2, above, CEQA does not require the provision of all requested information, as long as a good faith effort at full disclosure is made.

I-162.4 This comment requests viewpoints to show trees at a full range of maturity next to the proposed warehouses, as well as during winter and springtime. The Project's effects on viewpoints during other seasons and during the growth of Project landscaping would not change the Draft EIR's impact determination on scenic vistas or visual character. As discussed in Response I-162.2, above, CEQA does not require the provision of all requested information, as long as a good faith effort at full disclosure is made.

I-162.5 This comment generally asserts impacts related to aesthetics would be significant and unavoidable even after mitigation is incorporated. In response to this comment, please see Topical Response 1 – Aesthetics.

I-162.6 This comment presents a photograph of the site from an unidentified vantage point. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR.

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From: K Doty <dkdoty2@gmail.com>
Sent: Sunday, February 26, 2023 7:51 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Kristy Doty
8805 morninglight circle
92508
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-163

Kristy Doty
February 26, 2023

I-163.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Sunday, February 26, 2023 7:53 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
K Doty
8805 Morninglight Circle
92508
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-164

K Doty
February 26, 2023

I-164.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Mohsen Lesani <mohsen.lesani@gmail.com>
Sent: Sunday, February 26, 2023 9:28 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I am deeply concerned about the air quality and traffic associated with this project. In particular, I am worried for my kid and the injustice towards kids in the neighbourhood.

I-165.1

Sincerely,
Mohsen

Mohsen Lesani
Associate Professor
Computer Science & Engineering
University of California Riverside
http://www.cs.ucr.edu/~lesani/

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

Traffic

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

I-165.2

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the

area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project.

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

I-165.2 Cont.

Air quality

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission

I-165.3

equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I-165.3 Cont.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Letter I-165

Mohsen Lesani
February 26, 2023

I-165.1 This comment expresses general concerns, is introductory in nature, and does not raise any specific issues or concerns about the environmental analysis in the Draft EIR. As such, no further response is required.

I-165.2 This comment is identical to Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-165.3 This comment is identical to Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Ronald Peters <rjpeters13@yahoo.com>
Sent: Sunday, February 26, 2023 1:05 PM
To: Dan Fairbanks
Cc: Michael McCarthy; Jen L.
Subject: West Campus Upper Plateau, DEIR Letters of Concern
Attachments: West Plateau_Ronald Peters DEIRLetters of Concern_2023-02-26.pdf; Scan02262023125941.pdf

Dear Mr. Fairbanks:
I'm a resident of the Mission Grove neighborhood and great concerns about the above proposed development and as it relates to my health and well-being and that of my family and community. Our family has invested our futured in this area, and this development was ever a part of that future. I feel this is a misguided project and should have never been given the opportunity to advance. The plateau property is far more valuable than locations for warehouses. This has caused anxieties for all in the community based on the information and group meetings I've been a part of. It's my hope this project reaches it end, and your agency can sit down with the community and discuss a more practical development for this site.

Below is a list of the letters I'm attaching in a combined and single file, as my DEIR Letters of Concern for the above project:

Geology and Soils, Wind, Blasting & Radon
Geology and Soils, Blasting & Gas Utility
Geology and Soils, Landslides & Terraced Lots
Geology and Soils, Earthwork
Geology and Soils, Grading Cross Sections

Hydrology, Camino Del Sol Drainage Sumps
Hydrology, Ground and Surface Water
Hydrology, Recharge
Hydrology, Water Quality

Utility and Services, Flood Control
Utility and Services, Landfill
Utility and Services, Trenchless Technology

Noise, Park

Thank you in advance for reviewing my letters, and I look forward to meeting you in the future.

Ronald J. Peters, P.E.

I-166.1

Feb 26, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report

Dear Mr. Fairbanks:

On behalf of R-Now.com and a concerned resident of 7762 Northrop Dr., Riverside, I am writing to submit comments on the draft Environmental Impact Report for the proposed West Campus Upper Plateau. R-Now was formed to fight warehouse development impacting our residential community, and over development of warehouses in the southern California area. I'm a registered civil engineer with over 37 years of experience and have worked on design of warehouse projects throughout my carrier.

I have serious concerns regarding the use of trenchless technology, and how it's being applied to a threshold of less than significance classification.

My specific concerns are as follows:

- Section 4.17.3, Thresholds of Significance (page 788), and Section 4.17.4, Impact Analysis, UTL-1 (page 789), Infrastructure Improvements, Parks- as it relates to sewer improvements, the DEIR states, "Installation of new wastewater lines would consist of either trenching to depth of pipe placement or using a variety of different trenchless technology (page 792). Pipe sizes per DEIR exhibits range between 8 to 15-inches (Figure 3-7A, Page 147). With underlying granite rock, is it not likely trenchless technology would apply at this project site? Is it appropriate to use this technology to classify the threshold as less than significant? I-166.2

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely, Ronald J. Peters, P.E.

Ronald J. Peters, P.E.

Rjpeters13@yahoo.com
7762 Northrop Dr., Riverside, Ca. 92508

Feb 15, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report

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I have serious concerns regarding the area landfills supporting the project. Based on information provided in the DEIR (page 780) two of the three area landfills will cease to operate in or around 2029. The landfills are 15 to 27 miles for the project area. Assembly Bills 939 & 341 (page 782) were sighted in the DEIR to have been in place since 1989 and 2011, related to waste management. Even with these bills in place the DEIR indicates two landfills will close. With one or two landfill remaining in operation, how can the project justify the less than significant impact? The remaining landfills obviously will have a reduction in operation abilities resulting in extended wait times and increase truck traffic. How can the project justify a less than significant impact (Section 4.17.5, page 804)?

I-166.3

Section 4.17.1, (page 780), describes the existing conditions related to solid waste conditions. Section 4.17.4, Threshold UTL-4 (page 801) discusses the capacity of local infrastructure. Section 4.17.6, (page 804), provides the less than significant impact after mitigation.

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial warehouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,



Ronald J. Peters, P.E.

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7762 Northrop Dr., Riverside, Ca. 92508

Feb 15, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report

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I have serious concerns regarding drainage as described in the DEIR and related hydrology reports. The documents indicate project drainage will surface flow across the Camino Del Sol neighborhood from four project tributary locations to existing drainage systems at the north end of the community (Appendix K-1, Preliminary Hydrology Study, Section III, Table, Watershed, 3, 4, 5, 6, 7, 7a, 18a, 18b, and 18c). The hydrology reports for Building B & C detention basins data indicates various storm events will continue to flow over an extended period of 4 days (Appendix 5 & 6, Hydro Building B & C, Hydrograph Report, Time period indicated, last page of each report). The Preliminary Hydrology Report K-1 indicated slow release over two 2 days. Four days seems excessive since the existing condition lacks detention basins. In addition, flow at the four outlets shown in Section IV table (page 12 & 13) of the Preliminary Hydrology Report K-1 with velocities of 16 to 36 feet/second. This surface flow passes between homes and down streets that have excessive slopes. There are two sump conditions on Avenida Hacienda where it appears overflow will pass between homes without any type of drainage facility.

I-166.4

The drainage exhibits also indicate the project will manage flow by out letting drainage 300-feet from the Camino Del Sol neighborhood with no information shown to reduce the velocity. Has any analysis been completed on the proximity of the outlets, extend duration, high velocities, and erosion the community will experience? Can the existing drainage system in Camino Del Sol neighborhood manage these project flows without providing improvements to the neighborhood? Will a storm drain system be needed for the Camino Del Sol neighborhood to pass flow from south to north? Has the City and County of Riverside been contacted to help provide drainage guidance, since drainage

system may become owned by one of these governing bodies and also impact downstream facilities (Preliminary Hydrology Report K-1, page 6)?

I-166.4 Cont.

My specific concerns related the DEIR sections listed below:

- Section 1.9, Table 1-2, 4.8, Hydrology and Water Quality, HYD-3 (page 81). Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: underlying topics as provided in DEIR.
- Section 4.17.2, Goal 17 (page 787), Adequate flood control facilities shall be provided prior to, or concurrent with, development in order to protect the lives and property within the March JPA Planning Area.
- Section 4.17.2, Policy 17.3 (page 787): Require new development to construct new or upgrade existing drainage facilities to accommodate the additional storm runoff caused by the development.
- Section 4.17.3, Thresholds of Significance, UTL-1 (page 788), Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

I-166.5

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial warehouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

I-166.6

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,

Ronald J. Peters, P.E.

Rjpeters13@yahoo.com
7762 Northrop Dr., Riverside, Ca. 92508

Feb 26, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report

Dear Mr. Fairbanks:

On behalf of R-Now.com and a concerned resident of 7762 Northrop Dr., *Riverside,* I am writing to submit comments on the draft Environmental Impact Report for the proposed West Campus Upper Plateau. R-Now was formed to fight warehouse development impacting our residential community, and over development of warehouses in the southern California area. I'm a registered civil engineer with over 37 years of experience and have worked on design of warehouse and park projects throughout my carrier.

I have serious concerns regarding the proposed project's significant impact related to noise. It's one thing to have noise through construction, and another after the project is completed. The DEIR indicates significant impact on noise through temporary and permanent. The noise level from the park is indicated to be 55 dba, which is a level of normal conversation. I believe that's an incorrect estimate if the park is allowed to have organized games. I live at 7762 Northrop Drive and I can clearly hear screaming parents from soccer games being played at the Grove Community Church on a Saturday and Sunday, which is 3500-feet away. I'm sure everyone knows kids' soccer games are nothing but parents screaming at their kids. Please reassess this noise level at the park or provide justification for using such a low noise level. I would also recommend the park be moved to the eastside of the development if an active park will be allowed. If not, provide justification if park is to remain as currently located. Please see below sections related to the DEIR policies.

I-166.7

My specific concerns are as follows:

- Section 4.11.2, Goal 1, Policy 1.2, (page 591) Noise sensitive uses (such as schools, libraries, hospitals, medical facilities, residential uses, etc.,) shall be discouraged in areas where noise levels exceed acceptable limits.
- Section 4.11.2, Goal 2, Policy 2.2 (page 592), Noise generating facilities shall be located in areas with compatible noise generating land uses (i.e., airport noise contour areas) to minimize land use incompatibilities, noise abatement and mitigation measures needed.
- Section 4.11.4, Thresholds Significance, NOI-1 (Page 598), Result in generation of a substantial temporary or permanent increase in ambient noise levels in the

vicinity of the project in excess of standards established in the local general plan or noises ordinance, or applicable standards of other agencies.

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

I-166.7
Cont.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,

Ronald J. Peters, P.E.

Rjpeters13@yahoo.com
7762 Northrop Dr., Riverside, Ca. 92508

Feb 26, 2023

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Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
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Re: West Campus Upper Plateau, Environmental Impact Report

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My specific concern is related to a section of the DEIR listed below:

4.9.4 Impacts Analysis Threshold HYD-1 (page 504). Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? Specific Plan Area, Campus Development, Construction.

Several statements in the report indicate that these policy's will not be maintained. Section 4.9.4, as construction erosion will result due to phasing over a period of 4.5 years. Several lots will remain rough graded, but not be developed. Open detention basins will be constructed in the interim to address hydrology and water quality. This report indicates bioretention will be limited, and overflow/by-pass will also occur. The report also has concern over wind and water erosion, where pollutants can attach themselves to soil particles and be transported to downstream drainage areas. If a complete seasonal investigation of the site would be completed, the report would be an agreement that during the beginning of the winter soft plant vegetation is non-existent. This is perhaps due to animal habitat overgrazing. What investigation has been completed to investigate this described lack of vegetation, and what measures can be provided to mitigate this perhaps natural condition?

I-166.8

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

I-166.8 Cont.

Sincerely,

Ronald J. Peters, P.E.

Rjpeters13@yahoo.com
7762 Northrop Dr., Riverside, Ca. 92508

Feb 26, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report

Dear Mr. Fairbanks:

On behalf of R-Now.com and a concerned resident of 7762 Northrop Dr., *Riverside,* I am writing to submit comments on the draft Environmental Impact Report for the proposed West Campus Upper Plateau. R-Now was formed to fight warehouse development impacting our residential community, and over development of warehouses in the southern California area. I'm a registered civil engineer with over 37 years of experience and have worked on design of warehouse projects throughout my carrier.

My specific concern is related to a section of the DEIR listed below:

Land Use Element, Goal 13: Policy 13.2 (page 502): Enhance local groundwater supplies through development designs which promote an on-site recharge and minimize permeable ground coverage with landscaped areas, open space or recreation areas.

The development of 304 acres of limited number of large industrial flat lots over an elevated hilltop area which does not allow for infiltration (Groundwater paragraph, page 494) is clearly not consistent with this above policy. Why wasn't a development proposed that would be in compliant with this policy and what justification would preclude overriding this policy?

I-166.9

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,

Ronald J. Peters, P.E.

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Feb 26, 2023

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March Joint Powers Authority
14205 Meridian Parkway, Suite 140
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My specific concerns are related to two sections of the DEIR as listed below:

Per Section 4.9.4, Relevant Plans, Policies, and Ordinances , JPA Water Resources, Goal 1, Policy 1.2 (page 501), Protect groundwater and surface water resources from depletion and sources of pollution.

Goal 2, Policy 2.5 (PAGE 502), To the greatest extent possible, require development to use master flood control facilities and limit use of interim drainage facilities or open channels.

I-166.10

Several statements in the report indicate that these two policies' will not be followed. Section 4.4.9. as it relates to construction erosion will result due to phasing over a period of 4.5 years. Two lots will be built on in the first few years, but several lots will remain rough graded and not be developed until owners are located. Open detention basins will be constructed in the interim to address hydrology and water quality. It's then understandable certain quantity of erosion and infiltration will occur. Erosion will pass downstream and infiltration will pass to underlying soil and migrate into the aquafer. These undeveloped sites will have pollutants that will not be fully addressed until build out.

With open detention basin this condition will not comply with migratory fowl and aircraft avoidance. What consideration was been given to interim open basin condition as it relates to migratory fowl and aircraft avoidance (Federal Aviation Administration Circular 150/5200-33B, page 497)?

What consideration has the project considered for contaminates into the groundwater based on this temporary open basin condition?

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

I-166.10
Cont.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,

Ronald J. Peters, P.E.

Rjpeters13@yahoo.com
7762 Northrop Dr., Riverside, Ca. 92508

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March Joint Powers Authority
14205 Meridian Parkway, Suite 140
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My specific concern is related to a section of the DEIR listed below:

JPA Water Resources, Goal 2, Policy 2.1 (page 502): Require development within identified flood hazard areas to comply with Floodplain Management Regulations and criteria for the Federal Flood Insurance Program.

The Del Camino neighborhood in the DEIR will have the project surface flow into this community where existing underground storm drain systems can be found at the northerly end of the existing development. There are several existing street sump conditions that will be impacted by these flows. Has the project completed any investigation on the impact to these street sumps, and the surrounding residential homes (Section 4.9.3, HYD-3, part (c), page 503)? I-166.11

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

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Feb 26, 2023

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14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report

Dear Mr. Fairbanks:

On behalf of R-Now.com and a concerned resident of 7762 Northrop Dr., *Riverside,* I am writing to submit comments on the draft Environmental Impact Report for the proposed West Campus Upper Plateau. R-Now was formed to fight warehouse development impacting our residential community, and over development of warehouses in the southern California area. I'm a registered civil engineer with over 37 years of experience and have worked on design of warehouse projects throughout my carrier.

I have serious concerns regarding the development's use of retaining walls and grading design. There's no information provided on exterior perimeter of the surrounding development, as to how usable development grades will match into the existing grades in the conservation and park areas. Are retaining walls and large slopes going to be used? The community has been here for years, and has concerns about the visual appearance they will see from their homes. Please provide cross section of the grading design to show slopes and retaining walls at the perimeter of the development.

I-166.12

My additional concerns specifically related to the DEIR are as follows:

- Section 4.6.2., Goal/Policy 3.2 (page 393), Encourages contour grading. How is Goal 3.2 achieved with the limited grading design provided (Plot Plan B & C) and overall lack of site grading information? The use of retaining walls would not be an agreement with this goal, since there is no contour grading with retaining walls.

- Section 4.6.2, Goal 2 (page 394), Under hillside management. Minimize grading and otherwise changing the natural topography. The concern here is limited information from the Plot Plan B & C and overall development provide no grading design of the outside the perimeter of the development. The information does indicate cuts of negative 30-feet and fills of positive 26-feet. There is no cross-sectional information to show relationships with existing topography to show how goal 2 is achieved.

How does a development like large warehouse, that require planer topography work well with a site that's a hilltop and underlined with granite rock. It's hard to believe a development such as this would be undertaken. Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

I-166.12
Cont.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,

Ronald J. Peters, P.E.

Rjpeters13@yahoo.com
7762 Northrop Dr., Riverside, Ca. 92508

Feb 26, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

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I have serious concerns regarding the amount of dirt/rock that will be moved at the completed site, and to and from the site. The DEIR references dirt and rock quantities from the Project Applicant (Section 4.2.5, page 229), but does not provide any grading exhibits to show an overall concept and dirt quantity estimate from the overall design grading. This is an enormous grading and rock excavation project, so this report needs to provide the complete information to determine what environment impact that will have to the community and provide a level agreement. How many truckloads of dirt will be brought to the site, or removed? Will the sight really balance? I-166.13

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

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I have serious concerns about my terraced lot, which is downhill from the development on Northrop Dr. I understand the bio-basins (Section 4.9.4, Threshold HYD-3 (page 516, Specific Plan/Campus Development (last paragraph of page 521 discusses detention basins), both temporary and permanent, will be open bottom basins. Has any investigation been included that will ensure water infiltrating into the soil from these basins will not flow underground and weaken the soil integrity of the sloped terraces, and cause them to fail? I didn't see any discussion on this in the Leighton Geology Report and the DEIR document.

I-166.14

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

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I have serious concerns regarding blasting as stated in the DEIR (PDF-NOI-2 & 3, page 29, and Table 1-2, 4.5 Geology and Soils, page 71 & 72, and numerous other locations in the DEIR) and the Seismic Refraction Study (Section 6, Results and Conclusions, page 3) to Leighton Consulting. DEIR Exhibit (3.7H, page 161) indicates a Southern California Gas utility crossing the development (Arc Light Drive alignment) from east to west (field markings in Mission Grove community indicate 30-inch gas). What coordination has been completed with Southern California Gas to include blasting within the project area relative to their utility? And what regulatory requirement would allow such an activity within proximity, and within the surrounding communities? Does the surrounding Cities of Moreno Valley and Riverside, and the County of Riverside provide any direction?

I-166.15

Even using jack hamming near the pipeline should require some level of concern, since there's a history of gas transmission mains exploding throughout the United States, i.e., San Bruno, 2010. The gas main crosses through the Mission Grove neighborhood where thousands of people live.

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

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I-166.16

Section 4.6.4 Impact Analysis, Threshold GEO-2 (page 399 & 400), blasting is discussed in several paragraphs as potentially significant impacts related to Campus Development, Parks, and Infrastructure Improvements.

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

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Letter I-166

Ronald Peters
February 26, 2023

I-166.1 This comment is introductory in nature and does not raise any specific comments or concerns about the environmental analysis in the Draft EIR. As such, no further response is required. Specific comments regarding the Draft EIR are provided and responded to below.

I-166.2 This comment expresses concerns about the use of trenchless technology. As explained in Section 4.17, Utilities and Service Systems, of the Draft EIR and as noted in the comment, installation of new utility lines would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology. Use of trenchless technology on sites with underlying granite rock would not be appropriate. There may be some situations where trenchless pipe installation would be beneficial on a limited basis, such as, but not limited to, avoiding existing buried facilities, tying into existing buried facilities, and to avoid disturbing previously undisturbed areas. The use of trenchless pipe installation in these discrete situations is determined by the Project engineer and is based on site conditions and specific situations that warrant the use of this technology. To clarify, the use of trenchless technology is not the determining factor for the threshold of significance or the determination that impacts associated with the installation of utility infrastructure would be less than significant. As explained in the Draft EIR, Threshold UTL-1 is whether the Project would require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The Draft EIR explains that trenchless technology causes substantially less ground disturbance and that trenching results in a temporary stockpiling of soil along the length of the trench, pending backfilling, which could result in potential short-term soil erosion. However, as the Draft EIR explains, construction would occur in accordance with the requirements of the Construction General Permit and the March JPA WQMP Guidance Document, which require development of a Storm Water Pollution Prevention Plan (SWPPP), and, as a result, impacts would be less than significant.

I-166.3 This comment expresses concerns about adequate landfill capacity in the future. As discussed in Section 4.17, Utilities and Service Systems, of the Draft EIR, three landfills would serve the Project site: El Sobrante Landfill, which is permitted through January 2051; Lamb Canyon Sanitary Landfill, which is currently permitted through April 2032 per the Solid Waste Information System;[1] and Badlands Sanitary Landfill, which according to the Solid Waste Information System, is permitted through January 2059. As such, of the three landfills, only one has the potential to close within the next decade. As discussed in Section 4.17, Utilities and Service Systems, of the Draft EIR, during construction, 65% of construction and demolition waste must be diverted from landfills. The remaining 35% of construction and demolition material could be accommodated at any of the three permitted landfills, and adequate capacity exists to accept waste at each of these landfills. As explained in the Draft EIR, during operations, AB 1826 (Chapter 727, Statutes of 2014) requires businesses to recycle their organic waste and requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses. This law phases in the mandatory recycling of commercial organics over time. In particular, the minimum threshold of organic waste generation by businesses decreases over

[1] https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2246?siteID=2368

time, which means an increasingly greater proportion of the commercial sector will be required to recycle organic waste. Further, as explained in the Draft EIR, the incremental increase in solid waste produced during operation of the Campus Development can be accommodated within existing landfills. Through compliance with regulations to limit the amount of solid waste generated by the Project, and with at least two landfills permitted into 2050, adequate landfill capacity exists to accommodate the Project. The impact determination of less than significant is appropriate and supported by substantial evidence.

I-166.4 This comment expresses concerns regarding the drainage as described in the Draft EIR and accompanying hydrology reports and raises specific concerns about surface flow across the Camino Del Sol neighborhood to existing drainage systems. As explained in the DRC Hydrology Responses to Comments (Appendix K-7), described in the Preliminary Hydrology Study included as Appendix K-1 to the Draft EIR and referenced in the comment, under existing conditions, stormwater drainage includes surface flows toward residential development to the north of the Project site that outlet into Sycamore Canyon Wilderness Park. The Camino Del Sol neighborhood is located north of the Project site. As explained in the Preliminary Hydrology Study, the proposed condition was designed to balance the watersheds as close to existing as possible. As explained in the DRC Hydrology Responses to Comments (Appendix K-7), it is standard in the County of Riverside and within March JPA is to detain stormwater runoff so that the proposed development does not increase the peak discharge rate from the undeveloped condition for the design storm events (100 Year – 24 Hour and 2 Year – 24 Hour design storm events). The existing parcels along the south side of Camino Del Sol that receive concentrated flows in the existing condition have drainage easements at approximately the locations where these existing concentrated flows drain through those properties. Watersheds 5A, 7, 18A, 18B, 18C all exit the Project site via surface flow, as detailed in Appendix K-1. Watersheds 3, 4, 5, 6, 7A outlet to existing infrastructure; Watershed 3 to a parkway drain on Barton Street; Watershed 4 to a concrete channel between existing parcels; Watershed 5 to a concrete channel between existing parcels; Watershed 6 to a concrete channel between existing parcels; and Watershed 7A to a concrete channel between existing parcels.

As explained in Section 4.9, Hydrology and Water Quality, of the Draft EIR, and in Appendix K-1, runoff from finished Project lots would flow into adjacent proposed roadways, which in turn would be routed to detention tanks, located within the landscape easements adjacent to the right-of-way. These tanks would be sized to hold the respective 100-year storm volumes, which would be released over 48 hours at rates less than or equal to existing conditions. All detention tanks would include 2-inch diameter drain lines, leading to a 6-inch diameter to 12-inch diameter storm drain line, and then to proposed modular wetland biotreatment units. The Project design uses modular wetland units (MWS unit) for the design capture volume (volume of rain required to be captured during the 85th percentile storm, which is between the 1- and 2-year storm, per Riverside Water Quality Management Plan requirements). When these MWS units are overwhelmed, flow 'bypasses' the MWS units to detention systems, which are buried pipe for stormwater storage, such that the released flow rates do not exceed the existing conditions. As noted in the comment, the Draft EIR includes lot-specific hydrologic analyses for Buildings B and C (included as Appendices K-5 and K-6 of the Draft EIR), and MM-HYD-3 requires lot-specific hydrologic analyses for the remaining parcels (other than Buildings B and C). MM-HYD-3 requires lot-specific hydrology/drainage reports that include measured pre-development flows and demonstration that stormwater runoff flow rate associated with specific lot development, would be less than or equal to existing stormwater runoff conditions, to prevent excessive on- and off-site runoff and

associated erosive scour. With the implementation of MM-HYD-3, impacts related to increased stormwater runoff would be less than significant. (Appendix K-7)

With regard to Buildings B and C, the hydrologic analyses in Appendices K-5 and K-6 of the Draft EIR conclude that post-construction runoff velocities will be less than existing conditions. The comment references data for detention basins associated with Buildings B and C. Exposed detention basins have mandated drawdown standards (i.e., 48-hour drawdown per FAA circular 150/5200-33B). The intent of these drawdown standards is to avoid vector issues (to avoid allowing mosquito larva to form and causing a mosquito problem) as well as eliminating pools of water that could attract waterfowl. As shown in Figures 4.9-4 and 4.9-5 of the Draft EIR, the detention systems proposed for Buildings B and C are underground tanks. For clarification purposes, the Draft EIR has been revised to replace "detention basin" with "detention tank", as appropriate. (Appendix K-7)

The high velocity concern raised by the comment is in regard to the pipe outlets for the stormdrain hydraulic model. Section III, Offsite, of the Project Preliminary Hydrology Study (Appendix K-1) states: "Rip rap will be placed at each outlet to slow down the velocity of the stormwater and not erode existing conditions." Those issues are already present. The Project would release the same or less of the pre-Project flowrate to those areas. The riprap erosion protection would act as energy dissipator to slow flow velocities to mitigate for erosion. (Appendix K-7)

Since, as discussed above, this Project is releasing flows from the site at or below the existing condition, and MM-HYD-3 will be implemented to prevent excessive off-site runoff, additional systems are not needed. Therefore, the Project would not exacerbate existing conditions such that new or different impacts would occur. (Appendix K-7)

I-166.5 This comment cites information and thresholds, goals and policies included in the Draft EIR and does not raise any specific issues or concerns about the analysis related to those statements or thresholds. As such, no further response is provided.

I-166.6 This comment is a concluding paragraph and does not raise any specific issues or concerns about the environmental analysis in the Draft EIR. As such, no further response is provided.

I-166.7 This comment raises concerns about operational noise associated with the Project and suggests that 55 dBA noise level for the Park may be underestimated. As explained in the Urban Crossroads Noise Responses to Comments (Appendix M-2) and Section 4.11, Noise, of the Draft EIR, the noise analysis used the reference noise levels to represent the Specific Plan operations and calculate the operational source noise levels, including park activities, that are expected to be generated at the Specific Plan area and the Specific Plan-related noise level increases that would be experienced at the sensitive receiver locations. As explained in Section 4.11, Noise, of the Draft EIR, the reference noise levels collected at an existing park are expected to reflect the noise level of activities within the open space-recreation land use areas of the Project site, since the reference noise level measurement includes youth soccer games, coaches shouting instructions, playground activities, and parents cheering, clapping, and speaking on cell phones. The reference noise levels include the park activities identified by the comment. As further explained in the Draft EIR, and shown in Table 9-1 in the Noise Study, a reference sound power level of 81.1 dBA Lw representing a sound pressure level of 49.4 dBA L_{eq} at 50 feet is used to describe the potential impacts from the Park. The reference noise

levels are used to assess the project related noise levels at the nearest noise sensitive receiver locations and demonstrate compliance with the 55 dBA L_{eq} exterior noise standards.

In addition, the Park noise source activities are limited to the daytime hours of 7:00 a.m. to 10:00 p.m. As indicated on Table 4.11-25 of the Draft EIR, and on Table 9-3 of the Noise Study, the daytime noise levels associated with Project Park activities at the nearest noise sensitive receiver locations R8, R9 and R10 are estimated to range from 20.8 to 27.6 dBA L_{eq}. Park noise source levels are far less than the 55 dBA L_{eq} daytime exterior noise level standards and are well below the existing daytime ambient noise levels presented in Table 5-1. The existing ambient noise levels west of the Project site that are represented by noise level measurement location L8 indicate that the existing daytime noise level is 47.3 dBA L_{eq}. Since the existing ambient noise levels west of the Park (47.3 dBA L_{eq}) are far higher than the potential noise levels from the Park (27.6 dBA L_{eq}), the Park will not generate a measurable increase in the existing ambient noise level at the nearest noise sensitive receiver locations west of the Project site. As indicated on Table 4.11-28 of the Draft EIR, and on Table 9-6 of the Noise Study, the combined ambient and Project noise levels at the nearest noise sensitive receiver locations R8, R9 and R10 are estimated to range from 47.8 to 50.0 dBA L_{eq}, with the noise increase attributed to the Project ranging from 0.3 to 1.4 dBA L_{eq}. (Appendix M-2)

The comment expresses concern with the location of the park and recommends relocating the park to the eastside of the Project site. The comment also cites information on noise-related policies and a significance threshold from the Draft EIR related to noise. However, as explained in the Draft EIR, the operational noise levels associated with the Project, including park activities, would not exceed the daytime and nighttime exterior noise level standards, and operational noise impacts would be less than significant at the nearby noise-sensitive receiver locations. Therefore, no project redesign or mitigation is required.

I-166.8 This comment cites concerns related to potential hydrology and water quality impacts associated with erosion concerns for parcels that would be rough graded and not be immediately developed. The comment also expresses concern regarding potential lack of winter vegetation.

As explained in the DRC Hydrology Responses to Comments (Appendix K-7) and Section 4.9, Hydrology and Water Quality, of the Draft EIR, during Project construction, the proposed Project will meet the requirements outlined in the California Stormwater Construction General Permit. The construction requirements include wind erosion control, sediment control and non-visible pollutant control through Best Management Practices (BMPs) as outlined in the Project Stormwater Pollution Prevention Plan (SWPPP). Typical BMPs that could be incorporated into the SWPPP to control construction-related erosion and sedimentation in dry weather and stormwater runoff include diverting off-site runoff away from the construction site; vegetating landscaped/vegetated swale areas as soon as feasible following grading activities; placing perimeter straw wattles to prevent off-site transport of sediment; using drop inlet protection (filters and sandbags or straw wattles), with sandbag check dams within paved areas; regular watering of exposed soils to control dust during demolition and construction; implementing specifications for demolition/construction waste handling and disposal; using contained equipment wash-out and vehicle maintenance areas; maintaining erosion and sedimentation control measures throughout the construction period; stabilizing construction entrances to avoid trucks from imprinting soil and debris onto the Project site and adjoining roadways; training, including for subcontractors, on general site housekeeping.

In addition, MM-HYD-1 would require an Interim Soil Stabilization Plan prior to issuance of a grading permit for the Specific Plan Area, detailing measures that will be taken to prevent soil erosion subsequent to grading and prior to construction on individual parcels. The Plan would account for onsite vegetation, or lack thereof. Examples of soil stabilization measures include construction of temporary desilting basins, hydroseeding for temporary establishment of grasses, use of natural and/or synthetic soil binders (i.e., tackifiers and soil stabilizers), straw wattle installation at regular intervals across each parcel and around parcel perimeters, and berm construction around the perimeter of each parcel to prevent off-site soil migration. MM-HYD-1 also requires site monitoring to be completed every six months and after rainfall events of 1.0 inch or greater to ensure that soil stabilization methods are continuing to be effective. In the event that erosion is observed during monitoring, corrective actions shall be taken immediately to prevent additional erosion. The Project will also obtain a Notice of Intent through the California State Water Resources Control Board for state inspection and inspection by a contracted Qualified SWPPP Practitioner (QSP). The Project will meet State of California and March JPA construction and post construction requirements for water quality standards. The Draft EIR properly concludes that, given the incorporation of all of the measures discussed above, the Project's construction-related hydrology impacts will be less than significant. (Appendix K-7)

I-166.9 This comment questions the proposed Project's consistency with Policy 13.2 of the March JPA General Plan Land Use Element that is discussed in Section 4.9, Hydrology and Water Quality, of the Draft EIR. March JPA General Plan Land Use Element Policy 13.2 is to enhance local groundwater supplies through development designs that promote on-site recharge and minimize impermeable ground coverage with landscaped areas, open space or recreation areas. Policy 13.2 implements Goal 13: Secure adequate water supply system capable of meeting normal and emergency demands for existing and future land uses. As discussed in Section 4.9, Hydrology and Water Quality, of the Draft EIR in the groundwater discussion referenced in the comment, the Project site is not underlain by a designated groundwater basin. As explained in the DRC Hydrology Responses to Comments (Appendix K-7), the type of soils underlying the Specific Plan Area has a slow rate of transmission with respect to groundwater recharge. In addition, the site-specific Master Project Specific Water Quality Management Plan (Appendix K-2) indicates the site is not suitable for stormwater infiltration BMPs. As explained in the Draft EIR, the Project site is not conducive to substantial groundwater recharge. The underlying soils of the Project site preclude the use of shallow infiltration-based design components. Geotechnically, infiltration is not ideal on hilltops because introducing groundwater into a sloped condition can have adverse effects to soil stability. For more specific information about the soil conditions at the Project site, please see the Geotechnical Exploration, included as Appendix G-1 to the Draft EIR. As explained in Appendix G-1, bedrock was encountered at shallow depths. This precludes the site from use of infiltration-based design components. Table 3-2, Development Standards, of the proposed Project Specific Plan sets forth the minimum landscaping requirements (10% for Business Park and Industrial parcels; 20% for Mixed Use parcels). Additionally, the Project proposes an approximately 60-acre park and 17.72 acres of additional open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. As a result, the proposed Project would not substantially interfere with groundwater recharge, is consistent with Policy 13.2, and impacts would be less than significant.

I-166.10 This comment questions the proposed Project's consistency during construction with Policies 1.2 and 2.5 of the March JPA General Plan Resources Management Element that are discussed in Section 4.9, Hydrology and Water Quality, of the Draft EIR. Policy 1.2, which is to protect groundwater and surface

water resources from depletion and sources of pollution, supports Goal 1 – Conserve and protect surface water, groundwater, and imported water resources. Policy 2.5, which is, to the greatest extent possible, require development to use master flood control facilities and limit use of interim drainage facilities or open channels, supports Goal 2 – Control flooding to reduce major losses of life and property. As discussed in Section 4.9, Hydrology and Water Quality, of the Draft EIR, the proposed Project will comply with the State of California and March JPA construction requirements for water quality standards. As explained in the DRC Hydrology Responses to Comments (Appendix K-7), due to the existing soil characteristics, the amount of water anticipated to be percolated into the soils is considered minimal due to shallow bedrock/granitic rock (from a design perspective no percolation is assumed). Implementation of soil stabilization measures as outlined in MM-HYD-1, would ensure effective control of potential soil erosion following grading and prior to construction on individual lots, such that impacts to surface water quality from the Project would be less than significant after mitigation is incorporated. Regarding the comment's concerns with open detention basins, construction BMPs such as open-air desilting basins are not designed to detain stormwater runoff as they are used prior to the development of tributary impervious surface and would drain within 48 hours as required by FAA circular 150/5200-33B. These designs are used to reduce sediment runoff prior to development of the property. Desilting basins in undeveloped parcels of land would be installed in accordance with the California Stormwater Quality Association (CASQA) recommendations.

I-166.11 This comment cites Policy 2.1 of the March JPA General Plan Resource Management Element which requires development to comply with Floodplain Management Regulations and criteria for the Federal Flood Insurance Program for development within identified flood hazard areas. As explained in Section 4.9, Hydrology and Water Quality, of the Draft EIR, the Project site is not within a flood plain and the potential for flooding is considered very low. Additionally, the Project site is not located within a Dam Hazard Zone per the County of Riverside Safety Element Figure 5. The Project would not impede or redirect flood flows. Impacts would be less than significant, and no additional mitigation is required.

The comment expresses concerns about Project flows to the Camino Del Sol neighborhood and existing street sump conditions. As discussed in the Draft EIR, MM-HYD-3 requires lot-specific hydrology/drainage reports that include measured pre-development flows and demonstration that stormwater runoff flow rate, associated with specific lot development, would be less than or equal to existing stormwater runoff conditions, to prevent excessive on- and off-site runoff and associated erosive scour. With the implementation of MM-HYD-3, impacts related to stormwater runoff would be less than significant with mitigation incorporated. Please refer also to Response I-166.4 above.

I-166.12 This comment expresses concerns about the visual appearance of potential retaining walls and large slopes at the perimeter of the Project. The comment asks for a cross section of the grading design to show slopes and retaining walls at the perimeter of the development. The comment also refers to goals and policies of the March JPA General Plan Resource Management Element that are discussed in Section 4.6, Geology and Soils, of the Draft EIR, specifically Policy 3.2, which encourages the use of contour grading methods when grading of hillsides, and Goal 2, which is to minimize grading and otherwise changing the natural topography, while protecting the public safety and property from geologic hazards. The Project requirements do not allow for grading outside of the current proposed limits around the perimeter of the Specific Plan Area, so walls are proposed in locations where grading slopes are not acceptable. The proposed development grading design is based on the existing topography with the north side of the proposed Specific Plan Area lower than the south-east corner with

parcels stepped in between. Appendix B of the Draft EIR provides Conceptual Grading Plans and Sight Line Sections.

As explained in Recirculated Chapter 3, Project Description, the proposed Specific Plan would regulate future development within the Project site. As such, and as explained in the EIR, the EIR evaluates implementation of the Specific Plan at a project level, while development specifics for certain parcels – and specifically Building B and Building C – are more certain at this time.

Simultaneous with the release of the Draft EIR for public review, the proposed West Campus Upper Plateau Specific Plan was made (and still is) available for public review in the following location online: https://marchjpa.com/mjpa-meridian-west-campus/. With regard to grading, pursuant to the Section 6.8, Grading, of the proposed Specific Plan, a conceptual grading design will be required for each Tentative Map application consistent with the March JPA Development Code, and grading designs will implement the goals and policies of the March JPA General Plan. Figure 6-9, Conceptual Grading Exhibit, in the proposed Specific Plan shows the proposed grading for each individual parcel in the West Campus Upper Plateau Specific Plan Area. Among other requirements, the Grading Plan Development Standards in the proposed Specific Plan require the overall shape, height, and gradient of any cut and fill slope to be designed to be consistent with the existing natural contours and scale of the natural terrain to the extent feasible. As set forth in Section 4.6, Geology and Soils, of the Draft EIR, the Project would incorporate MM-GEO-1, which requires all grading to be performed in accordance with the grading guidelines outlined in the March JPA Development Code and the West Campus Upper Plateau Specific Plan, among other measures.

The proposed Specific Plan also includes design guidelines and standards for walls and fences and indicates that fences and walls are anticipated to be proposed in conjunction with development of the individual project sites. The final locations and details of these fences and walls will be determined when buildings are designed and oriented during implementation of the Specific Plan. Figure 4-1, Landscape Fence and Wall Plan, of the Specific Plan depicts fence and wall locations and details on the proposed height and type of fences and walls. Proposed walls and fences for Buildings B and C are depicted on the Plot Plans for Buildings B and C included in Recirculated Chapter 3, Project Description, (see Figures 3-9 and 3-10). Figure 4-18 of the Specific Plan shows a typical screen wall. Figure 4-17 provides the Northern Landscape Buffer Interface. Figure 4-19 provides the Southeastern Landscape Buffer Interface.

The comment also references granite bedrock and questions the decision to place a warehouse on a hilltop. As explained in Section 4.6, Geology and Soils, of the Draft EIR, granite bedrock is present near the surface across the majority of the Project site. As explained in the Draft EIR, the bedrock material varies in integrity from completely disintegrated rock, which has become a dense soil-like deposit, to moderately weathered rock. As discussed above, the Project would incorporate MM-GEO-1, which requires compliance with the geotechnical recommendations contained in the geotechnical analysis included as Appendix G-1 of the Draft EIR as well as subsequent design-level geotechnical reports and includes measures to reduce the potential for slope instability during grading and construction.

I-166.13 This comment expresses concern regarding the movement of dirt and rock from the Project site and raises a question as to the number of truckloads of dirt that will be brought to or removed from the site. As explained in the Draft EIR and noted in the comment, earthwork activities are expected to balance on site and no import or export of soils would be required. As explained in Recirculated Section 4.2, Air Quality,

approximately 7,608,500 cubic yards of dirt and 1,501,055 cubic yards of rock would be moved around the site. Consistent with the comment's suggestion, this information was included in the environmental impact analysis. With regard to grading exhibits, please see Response I-166.12 above.

I-166.14 This comment questions whether an investigation has been conducted to determine what impacts water infiltration from temporary and permanent detention basins may have on soil integrity. As explained in the DRC Hydrology Responses to Comments (Appendix K-7), due to the existing soil characteristics, the amount of water anticipated to be percolated into the soils is considered minimal due to shallow bedrock/granitic rock (from a design perspective, no percolation is assumed). Construction BMPs such as open-air desilting basins are not designed to detain stormwater runoff as they are used prior to the development of tributary impervious surface and would drain within 48 hours as required by FAA circular 150/5200-33B. Any water infiltration would be minimal.

As referenced in the comment and as explained in Section 4.9, Hydrology and Water Quality, of the Draft EIR, MM-HYD-3 requires the completion of lot-specific hydrology/drainage reports prior to issuance of each building permit. Based on such reports, detention tanks shall be constructed on individual lots that are sized to accommodate stormwater runoff, such that flows do not exceed existing conditions, to prevent excessive on- and off-site runoff and flooding. The tanks at the site are anticipated to be constructed within the bedrock units on-site, which are anticipated to have very low permeability. With implementation of this mitigation, the Project's impacts on surface runoff and flooding would be less than significant. (Appendix K-7)

Infiltrated water, if any, is not expected to impact proposed 2:1 cut or fill slopes constructed according to the recommendations provided in the Geotechnical Exploration included as Appendix G-1 to the Draft EIR. As discussed above, the Project would incorporate MM-GEO-1, which requires compliance with the geotechnical recommendations contained in the geotechnical analysis included as Appendix G-1 of the Draft EIR as well as subsequent design-level geotechnical reports and includes measures to reduce the potential for slope instability during grading and construction. Thus, impacts related to slope instability would be less than significant. (Appendix K-7)

I-166.15 This comment expresses concerns regarding blasting activities and potential implications to Southern California Gas utility infrastructure in the Project area. Recirculated Chapter 3, Project Description, identifies the Project would require the relocation of SoCal Gas's gas line and states; "As part of grading activities for the Specific Plan Area, the alignment of the gas line would be adjusted to be consistent with the grading activities completed at the Project site. SoCal Gas will be responsible for carrying out the pipeline improvements; however, this EIR will provide the environmental review and clearance for SoCal Gas to proceed with the adjustment of the grade of the gas line to the proposed finished grading surface." The developer has contacted SoCal Gas about relocating the existing gas as part of the proposed development. Based on information provided to March JPA by the developer, during construction, the construction contractor and Project Applicant will coordinate blasting operations with SoCal Gas to provide adequate protection for the 30-inch gas line crossing the Project site. It should be noted that the existing gas line alignment falls within a fill portion of the site and rock removal is not anticipated within close proximity of the gas pipeline. From previous coordination with SoCal Gas, the minimum setback for blasting operations is 125 feet from the pipeline. If any rock removal is required within 125 feet of the SoCal Gas pipeline, an expansive grout will be utilized for rock breaking. The Project will be conditioned accordingly.

The comment also asks about regulatory requirements related to blasting and proximity to surrounding communities. As explained in Section 4.11, Noise, of the Draft EIR, although not specifically proposed, if blasting is determined to be required during excavation and grading, the blasting contractor is required to obtain blasting permit(s) from the state, and to notify Riverside County Sheriff's Department within 24 hours of planned blasting events. In addition, PDF-NOI-2 prohibits blasting within 1,000 feet of any residence or other sensitive receptor. In addition to the distance limits, any blasting or drilling activities shall not exceed the City construction noise threshold of 75 dBA L_{eq} for City residents or the County's construction noise threshold of 65 dBA L_{max} for County residents. The Project also includes PDF-NOI-3, which requires that all blasting activities be designed to meet the regulatory construction noise and vibration thresholds outlined on Table 4.11-7 of the EIR. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-166.16 This comment expresses concern regarding potential dust, debris, gases and hazardous materials resulting from blasting activity carried out during Project construction. As explained in Response I-166.15 above, and in Section 4.11, Noise, of the Draft EIR, although not specifically proposed, if blasting is determined to be required during excavation and grading, the blasting contractor is required to obtain blasting permit(s) from the state. In addition, PDF-NOI-2 prohibits blasting within 1,000 feet of any residence or other sensitive receptor. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-4), the Draft EIR evaluated emissions related to blasting, including both fugitive dust as well as emissions resulting from the use of explosives (see Appendix C-1, Table 5-2, Table 5-3, Table 5-4, and Table 5-5). The results of the analysis indicate that emissions resulting from blasting activity would be minimal and would result in less than significant impacts. Additionally, the Project would be required to implement dust control measures such as watering that would significantly reduce fugitive dust emissions.

Whether radon is present in the vicinity of the Project site, and if present, the extent to which blasting activities would result in its release, is unknown. The US EPA classifies Riverside County as Zone 2, indicating a moderate potential for radon (https://www.epa.gov/sites/default/files/2018-12/documents/radon-zones-map.pdf). However, radon is typically only a concern in enclosed spaces, such as a building or basement, where it can accumulate over time. Per the US EPA, when outdoors, radon disperses rapidly and is generally not a health issue (https://www.epa.gov/radiation/what-radon-gas-it-dangerous). Because blasting will occur in an open area at least over 1,000 feet away from any nearby sensitive receptors, any radon gas that is released would dissipate quickly and would not be able to reach potentially harmful concentrations. Given the distance that blasting would occur from any residential development or other sensitive receptor (over 1,000 feet) and given that it would occur outdoors and not indoors, there would be no impact from radon gas to any residences. (Appendix C-4)

Regarding the comment's question about wind studies, the LST and HRA analyses included in the Draft EIR are based on historical geographic wind patterns that are input into the dispersion modeling. Therefore, wind speeds and directions in the Project vicinity are considered in the criteria pollutant and HRA dispersion modeling. Additionally, the Project would also be required to comply with the SCAQMD Rule 403 that prohibits grading activities during high-wind events. (Appendix C-4)

Regarding the comment's requested mitigation, as noted above, PDF-NOI-2 prohibits blasting within 1,000 feet of any residence or other sensitive receptor. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Additionally, MM-AQ-3 prohibits grading on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the Project area (Source Receptor Area 23).

From: Ajay & Amisha Shah <amiaj2005@gmail.com>
Sent: Monday, February 27, 2023 9:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
Amisha Shah
18934 Picchu Ct., Riverside, CA 92508
amiaj2005@gmail.com

Letter I-167

Amisha Shah
February 27, 2023

I-167.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Ajay & Amisha Shah <amiaj2005@gmail.com>
Sent: Monday, February 27, 2023 9:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Amisha Shah
18934 Picchu Ct., Riverside, CA 92508
amiaj2005@gmail.com

Letter I-168

Amisha Shah
February 27, 2023

I-168.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Ajay & Amisha Shah <amiaj2005@gmail.com>
Sent: Monday, February 27, 2023 10:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Amisha Shah
18934 Picchu Ct., Riverside, CA 92508

amiaj2005@gmail.com

Letter I-169

Amisha Shah
February 27, 2023

I-169.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Amisha Shah <amiaj2008@gmail.com>
Sent: Monday, February 27, 2023 9:25 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

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Please help us in keeping our neighborhood as a wonderful place to live.

Sincerely,
Ajay Shah
18934 Picchu Ct, Riverside, CA 92508
amiaj2008@gmail.com

Letter I-170

Ajay Shah
February 27, 2023

I-170.1 This comment letter is Form Letter F – Jobs. The commenter adds the following sentence to the form letter: "Please help us in keeping our neighborhood as a wonderful place to live." This addition does not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter F Response.

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From: Amisha Shah <amiaj2008@gmail.com>
Sent: Monday, February 27, 2023 9:25 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please help us in keeping our neighborhood as a wonderful place to live.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Ajay Shah
18934 Picchu Ct., Riverside, CA 92508
amiaj2008@gmail.com

Letter I-171

Ajay Shah
February 27, 2023

I-171.1 This comment letter is Form Letter G – Traffic. The commenter adds the following sentence to the form letter: "Please help us in keeping our neighborhood as a wonderful place to live." This addition does not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter G Response.

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From: Amisha Shah <amiaj2008@gmail.com>
Sent: Monday, February 27, 2023 9:27 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Please re-consider alternatives to Warehouses.

Thank you for letting me comment on your project.

Sincerely,

Ajay Shah
18934 Picchu Ct., Riverside, CA 92508
amiaj2008@gmail.com

Letter I-172

Ajay Shah
February 27, 2023

I-172.1 This comment letter is Form Letter E – Project Consistency. In response to this comment, please see Form Letter E Response. The commenter adds the following sentence to the form letter: "Please re-consider alternatives to Warehouses." See Topical Response 8 - Alternatives, for the evaluation of Alternative 5 – Non-Industrial Alternative.

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From: Amisha Shah <amiaj2008@gmail.com>
Sent: Monday, February 27, 2023 9:28 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Ajay Shah
18934 Picchu Ct., Riverside, CA 92508

amiaj2008@gmail.com

Letter I-173

Ajay Shah
February 27, 2023

I-173.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Andrea Lynn Wood <andrea.wood@ucr.edu>
Sent: Monday, February 27, 2023 9:16 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

I-174.1

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

I-174.1 Cont.

Personally, I enjoy using our remaining opening spaces for hiking and mountain biking. It concerns me that so little thought has been given to preserving more areas for community members to recreate and enjoy the beautiful surroundings that Riverside County has to offer.

I-174.2

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

I-174.3

Sincerely,

ANDREA WOOD
Riverside, CA 92521

Letter I-174

Andrea Wood
February 27, 2023

I-174.1 This comment is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

I-174.2 This comment expresses personal enjoyment of utilizing open spaces for hiking and mountain biking. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. This comment does not raise any issues, questions or concerns about the adequacy of the analysis in the Draft EIR. As such, no further response is provided.

I-174.3 This comment is the final paragraph of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Beverly Arias <beverly951@yahoo.com>
Sent: Monday, February 27, 2023 9:13 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).
The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.
The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.
The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.
The justification for this widely opposed project appears to be the creation of 2,600 jobs.
How did the applicant identify this number? On what was it based?
There is no analysis that I can find to justify this assertion.
Please provide any analysis that you may have. Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work.
Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide?
On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT?
How did you create the traffic models assuming 21-mile commutes would be shortened to 16?
Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.
Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region.
The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs.
However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley).
There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%).
At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard),
that leaves about 11,000 total unemployed people in the region.
If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs.
The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf,
p.4.10-32).

It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses.
That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers. It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect.
This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project. Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses?
Or the fact that Californians are required to purchase electric vehicles by 2035?
Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates. Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect.
It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment.
Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Beverly M. Arias
Community Activist
Ward 4 Resident
Casa Blanca

Seiu Local 1000
Statewide Latinx Committee member

Letter I-175

Beverly Arias
February 27, 2023

I-175.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Beverly Arias <beverly951@yahoo.com>
Sent: Monday, February 27, 2023 9:21 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.

The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document.

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

How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account.

Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project.

I also have concerns about how traffic will affect our arterial streets.

Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods.

This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety.

What are the enforcement mechanisms to ensure the supposed mitigation of traffic?

Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement?

How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

I-176.1

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.
Please redo your traffic study to reflect the actual conditions of the surrounding area.

I-176.1 Cont.

As a longtime resident of CasaBlanca, we are subject to the aftermath of these trucks destroying our narrow streets. For decades we have been bringing this to the attention of several of our public officials and the problems increase.

I-176.2

Please take our concerns into consideration.

Thank you!

Sincerely,

Beverly M. Arias
Community Activist
Ward 4 Resident
Casa Blanca

Seiu Local 1000
Statewide Latinx Committee member

Letter I-176

Beverly Arias
February 27, 2023

I-176.1 This comment is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-176.2 This comment describes experience with existing trucks damaging streets within CasaBlanca. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The comment does not raise specific concerns, issues or questions about the environmental analysis in the Draft EIR.

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From: Yong Belle <menthethin@hotmail.com>
Sent: Monday, February 27, 2023 5:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Yours,
Belle Chang

Letter I-177

Belle Chang
February 27, 2023

I-177.1 This comment letter is truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Yong Belle <menthethin@hotmail.com>
Sent: Monday, February 27, 2023 6:01 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Belle Chang
19059 Bergamont Dr

Riverside 92508

Letter I-178

Belle Chang
February 27, 2023

I-178.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Benjamin Fernandez <bcvf5@sbcglobal.net>
Sent: Monday, February 27, 2023 11:42 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have. Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16? Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate. Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers. It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project. Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates. Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally. Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
Benjamin Fernandez
8468 Lucia St.

Riverside, CA 92508
bcvf5@sbcglobal.net

Letter I-179

Benjamin Fernandez
February 27, 2023

I-179.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Benjamin Fernandez <bcvf5@sbcglobal.net>
Sent: Monday, February 27, 2023 11:42 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Benjamin Fernandez
8468 Lucia St.
Riverside, CA 92508
bcvf5@sbcglobal.net

Letter I-180

Benjamin Fernandez
February 27, 2023

I-180.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Benjamin Fernandez <bcvf5@sbcglobal.net>
Sent: Monday, February 27, 2023 11:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site? We would ask for significant mitigations to be put in place to reduce the impacts on local residents. 1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing. I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028. I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected? Thank you for the opportunity to comment.

Sincerely,
Benjamin Fernandez
8468 Lucia St.
Riverside, CA 92508
bcvf5@sbcglobal.net

Letter I-181

Benjamin Fernandez
February 27, 2023

I-181.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Benjamin Fernandez <bcvf5@sbcglobal.net>
Sent: Monday, February 27, 2023 11:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies? In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan? As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated, "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred. Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public

comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process. Thank you for letting me comment on your project.

Sincerely,
Benjamin Fernandez
8468 Lucia St.
Riverside, CA 92508
bcvf5@sbcglobal.net

Letter I-182

Benjamin Fernandez
February 27, 2023

I-182.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Benjamin Fernandez <bcvf5@sbcglobal.net>
Sent: Monday, February 27, 2023 11:44 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area. Specifically, I would like to ask: 1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section? 2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project? 3. Why were PFAS and perchlorate omitted in soil testing? 4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis? 5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area. Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers. In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm. The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance. As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed Thank you for allowing me to provide comments on this project.

Sincerely,
Benjamin Fernandez
8468 Lucia St.
Riverside, CA 92508
bcvf5@sbcglobal.net

Letter I-183

Benjamin Fernandez
February 27, 2023

I-183.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Benjamin Fernandez <bcvf5@sbcglobal.net>
Sent: Monday, February 27, 2023 11:44 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Wildlife: 1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB. 2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old. Plant life: 1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life? 2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted. I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced? Thank you for allowing me to provide comments on this project.

Sincerely,
Benjamin Fernandez
8468 Lucia St.
Riverside, CA 92508
bcvf5@sbcglobal.net

Letter I-184

Benjamin Fernandez
February 27, 2023

I-184.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Benjamin Fernandez <bcvf5@sbcglobal.net>
Sent: Monday, February 27, 2023 11:44 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents. The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Benjamin Fernandez

8468 Lucia St.
Riverside, CA 92508
bcvf5@sbcglobal.net

Letter I-185

Benjamin Fernandez
February 27, 2023

I-185.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Brian Wardle <wardleb@gmail.com>
Sent: Monday, February 27, 2023 9:14 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Brian Wardle
OrangeCrest Neighborhood
Riverside, 92508

Letter I-186

Brian Wardle
February 27, 2023

I-186.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Christian Clarke <cclarke50793@yahoo.com>
Sent: Monday, February 27, 2023 9:52 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?
Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images

reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.
The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.
The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.
The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Christian Clarke

Letter I-187

Christian Clarke
February 27, 2023

I-187.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Chad Smith <chadsmithx@gmail.com>
Sent: Monday, February 27, 2023 8:23 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
<include name, address, email in signature line>

Chad Smith
chadsmithx@gmail.com
Cell 909-225-4077
Fax 951-653-1003

Letter I-188

Chad Smith
February 27, 2023

I-188.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Chad Smith <chadsmithx@gmail.com>
Sent: Monday, February 27, 2023 8:23 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

<include name, address, email in signature line>

Chad Smith
chadsmithx@gmail.com
Cell 909-225-4077
Fax 951-653-1003

Letter I-189

Chad Smith
February 27, 2023

I-189.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Chad Smith <chadsmithx@gmail.com>
Sent: Monday, February 27, 2023 8:23 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

<include name, address, email in signature line>

Chad Smith
chadsmithx@gmail.com
Cell 909-225-4077
Fax 951-653-1003

Letter I-190

Chad Smith
February 27, 2023

I-190.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Chad Smith <chadsmithx@gmail.com>
Sent: Monday, February 27, 2023 8:23 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,YDrlBil5rXe1PvEQ-O_Nt7QJrvjxjnTrQhn7OSPYhHra6MjcX9dbA7mCbg2pwlIG65ufFs-0VNZ_ad-kTiJHSg7i2fPArc34jBEFT1Uw&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,hZIjXTkxBcwEX1OPHep3hTA6-ZZuUENAnp2HgExnqi-Apv5FrSITxK6IWJPT2vU3Tw-NhmmNAsL4Bwg_NhJhBgus8PGQzYuJD5FO_BFv7w,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

<include name, address, email in signature line>

Chad Smith
chadsmithx@gmail.com
Cell 909-225-4077
Fax 951-653-1003

Letter I-191

Chad Smith
February 27, 2023

I-191.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Chad Smith <chadsmithx@gmail.com>
Sent: Monday, February 27, 2023 8:24 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Chad Smith
8433 Gessay Place
Riverside, CA 92553
chadsmithx@gmail.com
Cell 909-225-4077
Fax 951-653-1003

Letter I-192

Chad Smith
February 27, 2023

I-192.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Chad Smith <chadsmithx@gmail.com>
Sent: Monday, February 27, 2023 8:25 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Chad Smith
8433 Gessay Place
Riverside CA 92508
chadsmithx@gmail.com
Cell 909-225-4077
Fax 951-653-1003

Letter I-193

Chad Smith
February 27, 2023

I-193.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: Chad Smith <chadsmithx@gmail.com>
Sent: Monday, February 27, 2023 8:23 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
<include name, address, email in signature line>

Chad Smith
chadsmithx@gmail.com
Cell 909-225-4077
Fax 951-653-1003

Letter I-194

Chad Smith
February 27, 2023

I-194.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

INTENTIONALLY LEFT BLANK

From: chrisr3685 <chrisr3685@yahoo.com>
Sent: Monday, February 27, 2023 7:34 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Sent via the Samsung Galaxy S22+ 5G, an AT&T 5G smartphone

Letter I-195

chrisr3685@yahoo.com
February 27, 2023

I-195.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

INTENTIONALLY LEFT BLANK

From: chrisr3685 <chrisr3685@yahoo.com>
Sent: Monday, February 27, 2023 7:34 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Sent via the Samsung Galaxy S22+ 5G, an AT&T 5G smartphone

Letter I-196

chrisr3685@yahoo.com
February 27, 2023

I-196.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: chrisr3685 <chrisr3685@yahoo.com>
Sent: Monday, February 27, 2023 7:35 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in vario

Sent via the Samsung Galaxy S22+ 5G, an AT&T 5G smartphone

Letter I-197

chrisr3685@yahoo.com
February 27, 2023

I-197.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: chrisr3685 <chrisr3685@yahoo.com>
Sent: Monday, February 27, 2023 7:35 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding ar

Sent via the Samsung Galaxy S22+ 5G, an AT&T 5G smartphone

Letter I-198

chrisr3685@yahoo.com
February 27, 2023

I-198.1 This comment letter is a truncated version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

INTENTIONALLY LEFT BLANK

From: chrisr3685 <chrisr3685@yahoo.com>
Sent: Monday, February 27, 2023 7:35 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive s

Sent via the Samsung Galaxy S22+ 5G, an AT&T 5G smartphone

Letter I-199

chrisr3685@yahoo.com
February 27, 2023

I-199.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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Letter I-200

[NOT USED]

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From: chrisr3685 <chrisr3685@yahoo.com>
Sent: Monday, February 27, 2023 7:35 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Sent via the Samsung Galaxy S22+ 5G, an AT&T 5G smartphone

Letter I-201

chrisr3685@yahoo.com
February 27, 2023

I-201.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

INTENTIONALLY LEFT BLANK

From: chrisr3685 <chrisr3685@yahoo.com>
Sent: Monday, February 27, 2023 7:35 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what univer

Sent via the Samsung Galaxy S22+ 5G, an AT&T 5G smartphone

Letter I-202

chrisr3685@yahoo.com
February 27, 2023

I-202.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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Letter I-203

[NOT USED]

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From: Denise Carlson <dd2carlson@aol.com>
Sent: Monday, February 27, 2023 6:12 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Sent from my iPhone

Letter I-204

Denise Carlson
February 27, 2023

I-204.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: David Denarola <Dave.Denarola@revrvgroup.com>
Sent: Monday, February 27, 2023 5:40 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance.

Thank you
David J Denarola
8272 Agapanthus Ct
Riverside Ca 92509

Get Outlook for iOS

Letter I-205

David Denarola
February 27, 2023

I-205.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

INTENTIONALLY LEFT BLANK

From: David Denarola <Dave.Denarola@revrvgroup.com>
Sent: Monday, February 27, 2023 5:41 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Thank you
David J Denarola
8272 Agapanthus Ct
Riverside Ca 92508

Get Outlook for iOS

Letter I-206

David Denarola
February 27, 2023

I-206.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Denette Lemons <lemonsdenette@gmail.com>
Sent: Monday, February 27, 2023 9:38 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,Denette Lemons 8634 de loss dr Riverside 92508 lemonsdenette@gmail.com <include name, address, email in signature line>

Letter I-207

Denette Lemons
February 27, 2023

I-207.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

INTENTIONALLY LEFT BLANK

From: Denette Lemons <lemonsdenette@gmail.com>
Sent: Monday, February 27, 2023 9:39 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,Denette Lemons 8634 de loss dr Riverside 92508 lemonsdenette@gmail.com <include name, address, email in signature line>

Letter I-208

Denette Lemons
February 27, 2023

I-208.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Denette Lemons <lemonsdenette@gmail.com>
Sent: Monday, February 27, 2023 9:39 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,O80dE0nBs3UvH9iJkbSNGYVRJWlqbQZMfZX_KM0rrwDqJGW3CAOoEwxtPkoOA7zLJCgos6rQCvKqJ7RXznkgPVYzOVII1tG0LQ-9hZh37fb_vJyuEuXVjSI,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,JU9XF80StvZSU01JoLh6lfAfcgBy3NEkaPNQLWPuGkrMrMaXPYOw7bIC_Kg98pP99FgCqna_M2JxdX-lBzsi8p2aKT5Dku6CMDOSBhAfDjmc5pz35UKu5zFs&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,Denette Lemons. 8634 de loss dr Riverside 92508 lemonsdenette@gmail.com

<include name, address, email in signature line>

Letter I-209

Denette Lemons
February 27, 2023

I-209.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Denette Lemons <lemonsdenette@gmail.com>
Sent: Monday, February 27, 2023 9:40 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,Denette Lemons. 8634 de loss dr Riverside Ca 92508
lemonsdenette@gmail.com

<include name, address, email in signature line>

Letter I-210

Denette Lemons
February 27, 2023

I-210.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: Denette Lemons <lemonsdenette@gmail.com>
Sent: Monday, February 27, 2023 9:40 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,Denette Lemons
8634 de loss dr Riverside 92508
lemonsdenette@gmail.com

<include name, address, email in signature line>

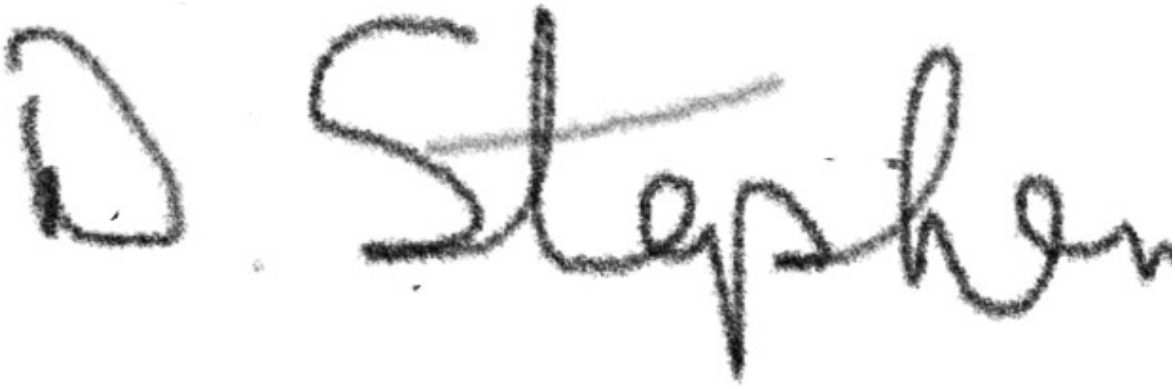
Letter I-211

Denette Lemons
February 27, 2023

I-211.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

INTENTIONALLY LEFT BLANK

From: DONNA STEPHENSON <dsteph2107@aol.com>
Sent: Monday, February 27, 2023 7:33 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304



Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Sent from my iPad

Letter I-212

Donna Stephenson
February 27, 2023

I-212.1 This comment letter is a truncated version of Form Letter G – Traffic and includes a large hand-drawn signature. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Eunhee Kim <eunster@yahoo.com>
Sent: Monday, February 27, 2023 5:11 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:

1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
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5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchlorothylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

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The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Eunhee Kim
Raleigh, NC 27615
eunster@yahoo.com

Letter I-213

Eunhee Kim
February 27, 2023

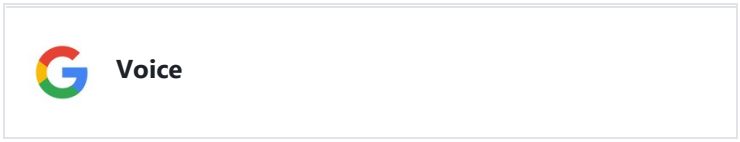
I-213.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Eunhee Kim <eunster@yahoo.com>
Sent: Monday, February 27, 2023 5:13 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304



Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. **Why did each of the alternative plans include 143 acres of industrial zoning?** The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. **Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.**

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; **how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?**

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions**"** and **"**Protect the interest of, and existing

commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." **How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.**

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). **In what specific ways have you incorporated Community Preference in the development of your plan?**

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

> "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
> b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
> d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Eunhee Kim
Raleigh, NC 27615
eunster@yahoo.com

Letter I-214

Eunhee Kim
February 27, 2023

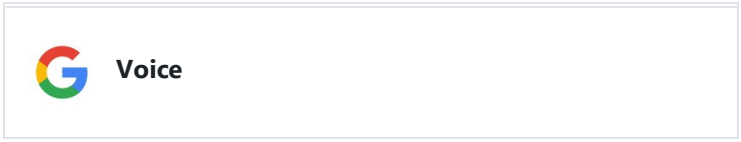
I-214.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Eunhee Kim <eunster@yahoo.com>
Sent: Monday, February 27, 2023 5:14 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304



Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Eunhee Kim
Raleigh, NC 27615
eunster@yahoo.com

Letter I-215

Eunhee Kim
February 27, 2023

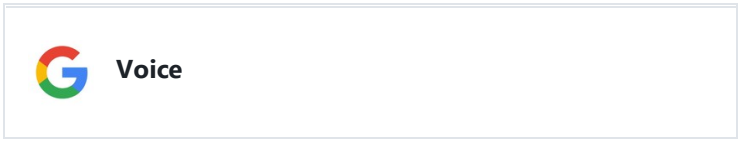
I-215.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Eunhee Kim <eunster@yahoo.com>
Sent: Monday, February 27, 2023 5:15 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304



Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Eunhee Kim
Raleigh, NC 27615
eunster@yahoo.com

Letter I-216

Eunhee Kim
February 27, 2023

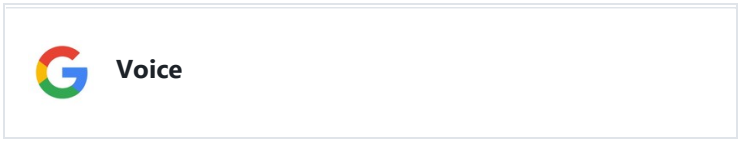
I-216.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Eunhee Kim <eunster@yahoo.com>
Sent: Monday, February 27, 2023 5:16 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304



Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities

of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Eunhee Kim
Raleigh, NC 27615
eunster@yahoo.com

Letter I-217

Eunhee Kim
February 27, 2023

I-217.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Eunhee Kim <eunster@yahoo.com>
Sent: Monday, February 27, 2023 5:17 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304



Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Eunhee Kim
Raleigh, NC 27615

Letter I-218

Eunhee Kim
February 27, 2023

I-218.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Eunhee Kim <eunster@yahoo.com>
Sent: Monday, February 27, 2023 5:08 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Eunhee Kim
Raleigh, NC 27615
eunster@yahoo.com

Letter I-219

Eunhee Kim
February 27, 2023

I-219.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Fernando sosa jr. <sosa1977@gmail.com>
Sent: Monday, February 27, 2023 11:01 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Fernando Sosa Jr , Orangecrest resident

Letter I-220

Fernando Sosa Jr.
February 27, 2023

I-220.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Fernando sosa jr. <sosa1977@gmail.com>
Sent: Monday, February 27, 2023 11:02 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

F6FkPMi_3yN61tdvdskwr5GikCcNP7aul3cI776YYhpbGr0fu56Lcjrm-DA,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
DJ Weems
2171 Gainsborough Dr
Riverside, CA. 92506

Letter I-221

Fernando Sosa Jr.
February 27, 2023

I-221.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Fernando sosa jr. <sosa1977@gmail.com>
Sent: Monday, February 27, 2023 11:03 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Fernando Sosa Jr , Orangecrest resident

Letter I-222

Fernando Sosa Jr.
February 27, 2023

I-222.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Fernando sosa jr. <sosa1977@gmail.com>
Sent: Monday, February 27, 2023 11:03 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Fernando Sosa Jr , Orangecrest resident

Letter I-223

Fernando Sosa Jr.
February 27, 2023

I-223.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Fernando sosa jr. <sosa1977@gmail.com>
Sent: Monday, February 27, 2023 11:04 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Fernando Sosa Jr, Orangecrest resident

Letter I-224

Fernando Sosa Jr.
February 27, 2023

I-224.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Fernando sosa jr. <sosa1977@gmail.com>
Sent: Monday, February 27, 2023 11:04 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Fernando Sosa Jr, Orangecrest resident

Letter I-225

Fernando Sosa Jr.
February 27, 2023

I-225.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Fernando sosa jr. <sosa1977@gmail.com>
Sent: Monday, February 27, 2023 11:04 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Fernando Sosa Jr , Orangecrest resident

Letter I-226

Fernando Sosa Jr.
February 27, 2023

I-226.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Felicia Valencia <feliciavalencia@msn.com>
Sent: Monday, February 27, 2023 9:22 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,tgAcba1GNKF0IsyV_K_KFpaAHzidyLeYgZ9TCjBnRgQm9DjFGcPfXUA53e7Yd1E89Kqa6E1ii0jaqkiF4CgwZz_Xyb91m1MyhmnIMnRUhTmGCaIm3w4ltjSK32x5&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone

(https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,Czq7iEJ61QlPDEKy6ld9biUBdJUfn-BxAyv6AhSUibaDtD3l_XiAqIIljHx_Zii3sDg70r9Aial9Cm0PvBusyrQ-UTUTqQhnnZ2WFVJpJcs11Wi02dg9e2Ud&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Felix and Felicia Valencia
19706 Krameria Ave.
Riverside, CA 92508

Letter I-227

Felicia Valencia
February 27, 2023

I-227.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Gayle Dicarlantonio <gayledmail@gmail.com>
Sent: Monday, February 27, 2023 10:00 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Gayle DiCarlantonio
Riverside, CA
gayledmail@gmail.com

Letter I-228

Gayle DiCarlantonio
February 27, 2023

I-228.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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Nicole Cobleigh

From: Gette Kell <thekellsrnotw@gmail.com>
Sent: Monday, February 27, 2023 7:13 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Letter I-229

Gette Kell
February 27, 2023

I-229.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Monday, February 27, 2023 9:42 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,Tf29D8um3fpW2NQvgA7kDNoM-RdQzhnQVnJdvhPK0-VI6hLEtGVf8DtY_f8UqzJg0d2tk-4149qLlR-vyE-85PFFucktpVPHhnxpu3IAzc3drWj1ixYFq8s,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,GsbAU_yAj7Oc9L0GJ8tk0xrRbmY85dsYxYBWIpTd8d4rI4Ido9DLGraKi4k1i_zbqmad3SayxMo-A8oAp1cWyCdo8frTcXtd08VLcXyDIaehmA,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Joseph Aklufi
Riverside, 92506
jaklufi@gmail.com

Joe Aklufi
(951)377-4255

Letter I-230

Joseph Aklufi
February 27, 2023

I-230.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Monday, February 27, 2023 9:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Joseph Aklufi
Riverside 92506
jaklufi@gmail.com

Joe Aklufi
(951)377-4255

Letter I-231

Joseph Aklufi
February 27, 2023

I-231.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Monday, February 27, 2023 9:44 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Joseph Aklufi
Riverside 92506

Joe Aklufi
(951)377-4255

Letter I-232

Joseph Aklufi
February 27, 2023

I-232.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Monday, February 27, 2023 9:45 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,
Joseph Aklufi
Riverside 92506
jaklufi@gmail.com

Joe Aklufi
(951)377-4255

Letter I-233

Joseph Aklufi
February 27, 2023

I-233.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Monday, February 27, 2023 11:39 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Joseph Aklufi
Riverside, 92506
jaklufi@gmail.com

Joe Aklufi
(951)377-4255

Letter I-234

Joseph Aklufi
February 27, 2023

I-234.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Monday, February 27, 2023 11:40 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Joseph Aklufi
Riverside 92506

jaklufi@ gmail.com

Joe Aklufi
(951)377-4255

Letter I-235

Joseph Aklufi
February 27, 2023

I-235.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Monday, February 27, 2023 11:42 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Joseph Aklufi
Riverside 92506
jaklufi@gmail.com

Joe Aklufi
(951)377-4255

Letter I-236

Joseph Aklufi
February 27, 2023

I-236.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: mkymsecltr <mkymsecltr@aol.com>
Sent: Monday, February 27, 2023 6:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

John W. Hagmann
7043 Mission Grove Pkwy, 92506
Mkymsecltr@aol.com

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-237

John W. Hagmann
February 27, 2023

I-237.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: mkymsecltr <mkymsecltr@aol.com>
Sent: Monday, February 27, 2023 6:41 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

John W. Hagmann
7043 Mission Grove Pkwy, 92506
Mkymsecltr@aol.com

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-238

John W. Hagmann
February 27, 2023

I-238.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: mkymsecltr <mkymsecltr@aol.com>
Sent: Monday, February 27, 2023 6:42 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

John W. Hagmann

7043 Mission Grove Pkwy, 92506
Mkymsecltr@aol.com

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-239

John W. Hagmann
February 27, 2023

I-239.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: mkymsecltr <mkymsecltr@aol.com>
Sent: Monday, February 27, 2023 6:38 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

John W. Hagmann, Mission Grove 92506

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-240

John W. Hagmann
February 27, 2023

I-240.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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Nicole Cobleigh

From: Janice Oien <gdojlo@yahoo.com>
Sent: Monday, February 27, 2023 8:11 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-241.1

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

I-241.1 Cont.

Sincerely,
This project has all the signs of approval from people who do not live anywhere near the land that is to be completely destroyed. Please reconsider this action.
<include name, address, email in signature line>

I-241.2

Janice Oien. 92508
Sent from my iPhone

Letter I-241

Janice Oien
February 27, 2023

I-241.1 This comment is identical to Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-241.2 This comment does not raise any issues, questions or concerns about the environmental analysis included in the Draft EIR.

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From: Janice Oien <gdojlo@yahoo.com>
Sent: Monday, February 27, 2023 8:21 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

I-242.1

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
<include name, address, email in signature line>Janice Oien. 92508

I am beyond distressed. The thought of killing all the wildlife out on this property is without reason. Warehouses are a blight to our community.
Sent from my iPhone

I-242.2

Letter I-242

Janice Oien
February 27, 2023

I-242.1 This comment is identical to Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

I-242.2 This comment does not raise any issues, questions or concerns about the environmental analysis included in the Draft EIR.

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From: Janice Oien <gdojlo@yahoo.com>
Sent: Monday, February 27, 2023 8:21 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Janice Oien. 92508
<include name, address, email in signature line>

Sent from my iPhone

Letter I-243

Janice Oien
February 27, 2023

I-243.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Janice Oien <gdojlo@yahoo.com>
Sent: Monday, February 27, 2023 8:32 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

I-244.1

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-244.1 Cont.

Thank you for letting me comment on your project.
Serious and thoughtful insight has not been applied to this project please reconsider,the city deserves better decisions
Sincerely, Janice Oien. 92508 <include name, address, email in signature line>

I-244.2

Sent from my iPhone

Letter I-244

Janice Oien
February 27, 2023

I-244.1 This comment is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-244.2 This comment does not raise any issues, questions or concerns about the environmental analysis included in the Draft EIR.

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From: Janice Oien <gdojlo@yahoo.com>
Sent: Monday, February 27, 2023 8:37 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. I-245.1

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I-245.1 Cont.

Thank you for the opportunity to comment.
This community deserves clean air and this project will pollute our environment beyond acceptable limits. I assume you read environmental reports therefore there is no reasonable excuse to approve this project Sincerely, Janice Oien. 92508 <include name, address, email in signature line>

I-245.2

Sent from my iPhone

Letter I-245

Janice Oien
February 27, 2023

I-245.1 This comment is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-245.2 This comment contends the Project will exceed air quality standards. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. This comment does not raise any specific issues, questions or concerns about the environmental analysis included in the Draft EIR.

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From: Janice Oien <gdojlo@yahoo.com>
Sent: Monday, February 27, 2023 8:50 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

I-246.1

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. I-246.1 Cont.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you! I-246.2
Assuming you do not plan to move from this area how can you possibly approve this project. The traffic ,as you know , is now polluting our air traffic control is out of control
Sincerely, Janice Oien. 92508
<include name, address, emailsignature line>

Sent from my iPhone

Letter I-246

Janice Oien
February 27, 2023

I-246.1 This comment is identical to Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-246.2 This comment addresses air quality and traffic. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. This comment does not raise any specific issues, questions or concerns about the environmental analysis included in the Draft EIR.

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From: Janice Oien <gdojlo@yahoo.com>
Sent: Monday, February 27, 2023 8:52 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,ItTcW0aXjGbmB7DAS0gBZaSsrW2L1k8dfnVcYArQNlqFn3Qf9VVjx0MlbBVhBK0P4WrxztOeCGNiJP_Z9IbVhebwn9y5Ea0J9OsHWDDH77jkF4H5D5tr&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,nnfIUiCTfW-8NRAMnmPemqXJ22rU3x_ZZKpLOOxgeC_suPTSLZyxrZ996fpBZJ0BtoEF8hZc4k6BvMiKg54P4IHgW8oJNpOH806rCT_ORIO0ZqrQmgs0oiwRXA,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,Janice Oien 92508
20685 Camino Del Sol
<include name, address, email in signature line>

Sent from my iPhone

Letter I-247

Janice Oien
February 27, 2023

I-247.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Josie Sosa <josie.sosa@gmail.com>
Sent: Monday, February 27, 2023 1:09 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

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If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

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Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Josie Sosa 92508
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Josie Sosa

Letter I-248

Josie Sosa
February 27, 2023

I-248.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Josie Sosa <josie.sosa@gmail.com>
Sent: Monday, February 27, 2023 1:09 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Josie Sosa 92508
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Josie Sosa

Letter I-249

Josie Sosa
February 27, 2023

I-249.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Josie Sosa <josie.sosa@gmail.com>
Sent: Monday, February 27, 2023 1:10 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Josie Sosa 92508
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Josie Sosa

Letter I-250

Josie Sosa
February 27, 2023

I-250.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Josie Sosa <josie.sosa@gmail.com>
Sent: Monday, February 27, 2023 1:10 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Josie Sosa 92508

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Josie Sosa

Letter I-251

Josie Sosa
February 27, 2023

I-251.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Josie Sosa <josie.sosa@gmail.com>
Sent: Monday, February 27, 2023 1:10 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Josie Sosa 92508
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Josie Sosa

Letter I-252

Josie Sosa
February 27, 2023

I-252.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Josie Sosa <josie.sosa@gmail.com>
Sent: Monday, February 27, 2023 1:11 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Josie Sosa 92508
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Josie Sosa

Letter I-253

Josie Sosa
February 27, 2023

I-253.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Josie Sosa <josie.sosa@gmail.com>
Sent: Monday, February 27, 2023 1:11 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Josie Sosa 92508
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Josie Sosa

Letter I-254

Josie Sosa
February 27, 2023

I-254.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Joy Weimer <jnjnj4u@aol.com>
Sent: Monday, February 27, 2023 10:02 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-255.1

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2.

Our community should stay a community, not a thoroughfare. Homes are too expense, too many families with kids to add more traffic and potential car accidents, pedestrians hit by vehicles, etc. I-255.2
We don't want increases in warehouses, trucks, traffic, pollution.

Thank you!
Joy Weimer
19233 Stagecoach Ln
Riverside, Ca 92508

Letter I-255

Joy Weimer
February 27, 2023

I-255.1 This comment is a truncated version of Form Letter G – Traffic and does not raise any new or different issues than the form letter. As such, in response to this comment, please see Form Letter G Response.

I-255.2 This comment does not raise any specific issues, questions or concerns about the environmental analysis included in the Draft EIR.

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From: Joy Weimer <jnjnj4u@aol.com>
Sent: Monday, February 27, 2023 10:05 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I-256.1

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area.

Give us back our nice, non- commercial community! We pay a lot to live here…we deserve to know and have a voice.

I-256.2

Thank you,
Joy Weimer
19233 Stagecoach Ln
Riv, Ca 92508

Letter I-256

Joy Weimer
February 27, 2023

I-256.1 This comment is a shortened version of Form Letter E – Project Consistency and does not raise any new or different issues than the form letter. As such, in response to this comment, please see Form Letter E Response.

I-256.2 This comment does not raise any issues, questions or concerns about the environmental analysis included in the Draft EIR.

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From: Joy Weimer <jnjnj4u@aol.com>
Sent: Monday, February 27, 2023 10:11 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-257.1

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database wildlife impaction!

Nature, trees, natural beauty, Healthy air, all matter to us as a family community.

Go build elsewhere, not where animals are respected and have been living in peace. This area is not meant to be a metropolis! I-257.2

Thank you,
Joy Weimer
19233 Stagecoach Ln
Riv., CA 92508

Letter I-257

Joy Weimer
February 27, 2023

I-257.1 This comment is a shortened version of Form Letter C – Biological Resources and does not raise any new or different issues than the form letter. As such, in response to this comment, please see Form Letter C Response.

I-257.2 This comment does not raise any issues, questions or concerns about the environmental analysis included in the Draft EIR.

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From: Joy Weimer <jnjnj4u@aol.com>
Sent: Monday, February 27, 2023 10:12 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe is this ok and the community has no say?

Sincerely,
Joy Weimer
19233 Stagecoach Ln
Riv, Ca 92508

Letter I-258

Joy Weimer
February 27, 2023

I-258.1 This comment is a shortened version of Form Letter A – Aesthetics and does not raise any new or different issues than the form letter. As such, in response to this comment, please see Form Letter A Response.

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From: doublejumps <doublejumps@aol.com>
Sent: Monday, February 27, 2023 11:26 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Kathleen Jump
doublejumps@aol.com
427 Pine Tree Way, Riverside, CA 92506

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-259

Kathleen Jump
February 27, 2023

I-259.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: doublejumps <doublejumps@aol.com>
Sent: Monday, February 27, 2023 11:29 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Kathleen Jump
doublejumps@aol.com
427 Pine Tree Way, Riverside, CA 92506

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-260

Kathleen Jump
February 27, 2023

I-260.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: doublejumps <doublejumps@aol.com>
Sent: Monday, February 27, 2023 11:32 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Kathleen Jump
doublejumps@aol.com
427 Pine Tree Way, Riverside, CA 92506

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-261

Kathleen Jump
February 27, 2023

I-261.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: doublejumps <doublejumps@aol.com>
Sent: Monday, February 27, 2023 11:34 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Kathleen Jump
doublejumps@aol.com
427 Pine Tree Way, Riverside, CA 92506

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-262

Kathleen Jump
February 27, 2023

I-262.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: doublejumps <doublejumps@aol.com>
Sent: Monday, February 27, 2023 11:35 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Kathleen Jump
doublejumps@aol.com
427 Pine Tree Way, Riverside, CA 92506

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-263

Kathleen Jump
February 27, 2023

I-263.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: doublejumps <doublejumps@aol.com>
Sent: Monday, February 27, 2023 11:36 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Kathleen Jump
doublejumps@aol.com

427 Pine Tree Way, Riverside, CA 92506

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-264

Kathleen Jump
February 27, 2023

I-264.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: doublejumps <doublejumps@aol.com>
Sent: Monday, February 27, 2023 11:38 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Kathleen Jump
doublejumps@aol.com
427 Pine Tree Way, Riverside, CA 92506

Sent from my Verizon, Samsung Galaxy smartphone

Letter I-265

Kathleen Jump
February 27, 2023

I-265.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: KELLEY PAGE <kpage68684@verizon.net>
Sent: Monday, February 27, 2023 2:49 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,Q_qRXWqPjUnfqvnER10xNOoAUe0hwbc1KLni5jCxmKXHu0o_7FvGX50Hu3mrojlTtUr4wpAKkbnEvNhlkAu-imMQr2AksbYQEASffeR1ZxYK1J96rvqSo-wH9w,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone

(https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,iUtqO_NsuA3_JH9TGd3gdDYauR3HwtXtyRuBN3ruekV95q39P-g63ipzGFIfCOt4Esr3i8r5Lx4VL2Zk9wVDRMpk5QBg2glawpYnyF8UWcwsk3DSMQbi1_iu9LI,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Suzanne Page
8830 Mt Sopras Ct, Riverside
kpage68684@verizon.net

Sent from my iPad

Letter I-266

Suzanne Page
February 27, 2023

I-266.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: KELLEY PAGE <kpage68684@verizon.net>
Sent: Monday, February 27, 2023 2:51 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

IDear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Suzanne Page
8830 Mt Sopras Ct, Riverside
kpage68684@verizon.net

Sent from my iPad

Letter I-267

Suzanne Page
February 27, 2023

I-267.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: KELLEY PAGE <kpage68684@verizon.net>
Sent: Monday, February 27, 2023 2:52 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Suzanne Page
8830 Mt Sopras Ct, Riverside
kpage68684@verizon.net

Sent from my iPad

Letter I-268

Suzanne Page
February 27, 2023

I-268.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: KELLEY PAGE <kpage68684@verizon.net>
Sent: Monday, February 27, 2023 2:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Suzanne Page
8830 Mt Sopras Ct, Riverside
kpage68684@verizon.net

Sent from my iPad

Letter I-269

Suzanne Page
February 27, 2023

I-269.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: KELLEY PAGE <kpage68684@verizon.net>
Sent: Monday, February 27, 2023 2:55 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Suzanne Page
8830 Mt Sopras Ct
Riverside
kpage68684@verizon.net

Sent from my iPad

Letter I-270

Suzanne Page
February 27, 2023

I-270.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: KELLEY PAGE <kpage68684@verizon.net>
Sent: Monday, February 27, 2023 2:57 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Suzanne Page
8830 Mt Sopras Ct, Riverside

kpage68684@verizon.net

Sent from my iPad

Letter I-271

Suzanne Page
February 27, 2023

I-271.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: KELLEY PAGE <kpage68684@verizon.net>
Sent: Monday, February 27, 2023 2:58 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Suzanne Page
8830 Mt Sopras Ct, Riverside
kpage68684@verizon.net

Sent from my iPad

Letter I-272

Suzanne Page
February 27, 2023

I-272.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: KATHLEEN RENICK <gileanor@verizon.net>
Sent: Monday, February 27, 2023 7:05 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Sent from my iPhone

Letter I-273

Kathleen Renick
February 27, 2023

I-273.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: KATHLEEN RENICK <gileanor@verizon.net>
Sent: Monday, February 27, 2023 7:08 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-274.1

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2 PLEASE DONT LET THIS GO THROUGH!! We can't stay in our home in this area if any more truck traffic and pollution!! I-274.2
Thank you!
Kathy Renick
19619 Mt Wasatch Dr
Riv, 92508

Sent from my iPhone

Letter I-274

Kathleen Renick
February 27, 2023

I-274.1 This comment is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-274.2 This comment expresses opposition to the Project but does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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From: Leroy Ward <lward7944@yahoo.com>
Sent: Monday, February 27, 2023 6:20 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. With all due respect Personally I have seen the increase in the number of trucks on the 215 and I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2. These warehouse are just popping up with little regard for its negative impact to our communities. This trend must stop and put citizens first.

Letter I-275

Leroy Ward
February 27, 2023

I-275.1 This comment is introductory in nature and the same as the beginning of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-275.2 This comment paraphrases Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Mike Dearman <mikedearman61@gmail.com>
Sent: Monday, February 27, 2023 9:09 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Michael Dearman
19148 Hitching Post Place, Riverside, CA 92508
Mikedearman61@gmail.com

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Letter I-276

Michael Dearman
February 27, 2023

I-276.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Mike Dearman <mikedearman61@gmail.com>
Sent: Monday, February 27, 2023 9:17 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Michael Dearman 19148 Hitching Post Riverside CA 92508
Mikedearman61@gmail.com

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Letter I-277

Michael Dearman
February 27, 2023

I-277.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Mike Dearman <mikedearman61@gmail.com>
Sent: Monday, February 27, 2023 9:13 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Michael Dearman, 19148 Hitching Post Place Riverside, CA 92508
Mikedearman61@gmail.com

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Letter I-278

Michael Dearman
February 27, 2023

I-278.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Mike Dearman <mikedearman61@gmail.com>
Sent: Monday, February 27, 2023 9:21 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Michael Dearman 19148 Hitching Post Place Riverside CA 92508
Mikedearman61@gmail.com

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Letter I-279

Michael Dearman
February 27, 2023

I-279.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Mike Dearman <mikedearman61@gmail.com>
Sent: Monday, February 27, 2023 9:25 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Michael Dearman 19148 Hitching Post Place Riverside CA 92508
Mikedearman61@gmail.com

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Letter I-280

Michael Dearman
February 27, 2023

I-280.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Maria Rodriguez <mariarod0421@gmail.com>
Sent: Monday, February 27, 2023 1:34 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Maria R
92508

Letter I-281

Maria Rodriguez
February 27, 2023

I-281.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: Maria Rodriguez <mariarod0421@gmail.com>
Sent: Monday, February 27, 2023 1:39 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Maria R
92508

Letter I-282

Maria Rodriguez
February 27, 2023

I-282.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Maria Rodriguez <mariarod0421@gmail.com>
Sent: Monday, February 27, 2023 1:48 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning to be your lasting legacy. I await your detailed response.

Sincerely,

Maria R
9208

Letter I-283

Maria Rodriguez
February 27, 2023

I-283.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

INTENTIONALLY LEFT BLANK

From: Michele Stewart <mish.stewart@verizon.net>
Sent: Monday, February 27, 2023 6:45 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Are you familiar with Steven Speilberg's first movie, **Duel**?

I was recently treated to a first hand encounter, on a similar level, by a semi truck and trailer fully loaded on the 215. I felt like it was a life or death situation as he pressed and pressed for me to go faster and faster. I could not even see his headlights he was so close. I couldn't get off the freeway fast enough. Not anywhere near my destination.

Dangerous encounters like this will become more and more common if we allow warehouses in residential areas.

This is an example of how you have not gone out far enough with your analysis to study the impact on our community. The traffic on the 215 is so daunting it is always at a stand still. Your project will only increase the congestion.

Additionally, **big rigs and young drivers** don't mix. We have young drivers, 15 and 16 year olds, just learning to drive on our residential streets. Allowing big rigs to plow through our community is a recipe for disaster and a very dangerous proposition.

This is a community of homes, where children live and grow up, it is not an industrial area. Your study doesn't adequately address the impact of warehouses on the streets and freeways that boarder our bedroom community.

I-284.1

I implore you to rethink the location and place it somewhere safe. Protect the lives of those in our community and build away from our homes and schools.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.

The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; **it is less than a quarter mile from a preschool** and the entire project is sited within a 1,500-foot range of residential homes.

I-284.2

The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I implore you to **Please** consider our plight and reconsider the location of your project.

I-284.3

Sincerely,

Michele Stewart
Homeowner
Resident
Family member
Someone who has been dangerously tailgated by a big rig- not far from my house!

Letter I-284

Michele Stewart
February 27, 2023

I-284.1 This comment raises concern regarding Project's potential traffic impacts on Interstate-215 (I-215) and residential streets, as well as the adequacy of analysis contained in the Draft EIR regarding this issue. As explained in the Urban Crossroads Transportation Response to Comments (Appendix N-3), the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

I-284.2 This comment asks that the Project location be reconsidered and describes the existing land uses surrounding the Project site, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 SF of warehouse use, 528,951 SF of office use, and 160,921 SF of retail use. The comment does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is required.

I-284.3 The comment generally challenges the environmental analysis in the Draft EIR but does not raise specific issues or concerns regarding land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing. This comment requests evaluation of a non-industrial alternative. See Topical Response 8 - Alternatives, for the evaluation of Alternative 5 – Non-Industrial Alternative.

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From: Michele Stewart <mish.stewart@verizon.net>
Sent: Monday, February 27, 2023 7:02 PM
To: Dan Fairbanks
Subject: Fwd: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Are you familiar with Steven Speilberg's first movie, **Duel**?

I was recently treated to a first hand encounter, on a similar level, by a semi truck and trailer fully loaded on the 215. I felt like it was a life or death situation as he pressed and pressed for me to go faster and faster. I could not even see his headlights he was so close. I couldn't get off the freeway fast enough. Not anywhere near my destination.

Dangerous encounters like this will become more and more common if we allow warehouses in residential areas.

This is an example of how you have not gone out far enough with your analysis to study the impact on our community. The traffic on the 215 is so daunting it is always at a stand still. Your project will only increase the congestion.

Additionally, **big rigs and young drivers** don't mix. We have young drivers, 15 and 16 year olds, just learning to drive on our residential streets. Allowing big rigs to plow through our community is a recipe for disaster and a very dangerous proposition.

This is a community of homes, where children live and grow up, it is not an industrial area. Your study doesn't adequately address the impact of warehouses on the streets and freeways that boarder our bedroom community.

I implore you to rethink the location and place it somewhere safe. Protect the lives of those in our community and build away from our homes and schools.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.

The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; **it is less than a quarter mile from a preschool** and the entire project is sited within a 1,500-foot range of residential homes.

The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I implore you to **Please** consider our plight and reconsider the location of your project.

Sincerely,

Michele Stewart

8712 Flatiron Ct.
Riverside, CA 92508

Homeowner
Resident
Family member
Someone who has been dangerously tailgated by a big rig- not far from my house!

Letter I-285

Michele Stewart
February 27, 2023

I-285.1 The comment letter is identical to Letter I-284. See Responses to Comment Letter I-284 above.

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From: Nancy Gutierrez <nancygut582@gmail.com>
Sent: Monday, February 27, 2023 7:17 AM
To: Dan Fairbanks; Evelyn Kahn
Subject: comment for Meridian EIR
Attachments: MJPA EIR letter.docx

Dear Mr. Fairbanks,

At our meeting of February 22, 2023, the Board of the Canyon Hills of Riverside Homeowners Association (HOA) authorized the sending of the attached letter in response to the environmental impact report (EIR) released for the West Campus Upper Plateau project. I am sending this email as President of the HOA; however, please send any responses to our Association Manager who will distribute to the Board, as shown below and included on this email:

Condominium Management Services, Inc.
Attention: Evelyn Kahn, CCAM
675 W. Foothill Blvd, Suite 104
Claremont, CA 91711

Thank you.
Nancy Gutierrez

--
Nancy Gutierrez
582 Via La Paloma
Riverside, CA 92507
951-704-0041
nancygut582@gmail.com

Letter I-286

Nancy Gutierrez
February 27, 2023

I-286.1 This comment transmits a letter sent by the Board of Canyon Hills of Riverside Homeowners Association. See Response to Comment Letter O-1. No further response is required.

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From: Q Asberry <qasberry@gmail.com>
Sent: Monday, February 27, 2023 6:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Q'Vinc Asberry

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Letter I-287

Q'Vinc Asberry
February 27, 2023

I-287.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Q Asberry <qasberry@gmail.com>
Sent: Monday, February 27, 2023 6:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in vario

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Letter I-288

Q'Vinc Asberry
February 27, 2023

I-288.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Q Asberry <qasberry@gmail.com>
Sent: Monday, February 27, 2023 6:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding ar

Q'Vinc Asberry

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Letter I-289

Q'Vinc Asberry
February 27, 2023

I-289.1 This comment letter is a truncated version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Q Asberry <qasberry@gmail.com>
Sent: Monday, February 27, 2023 6:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Q'Vinc Asberry

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Letter I-290

Q'Vinc Asberry
February 27, 2023

I-290.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Q Asberry <qasberry@gmail.com>
Sent: Monday, February 27, 2023 6:56 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what univer

Q'Vinc Asberry

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Letter I-291

Q'Vinc Asberry
February 27, 2023

I-291.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Q Asberry <qasberry@gmail.com>
Sent: Monday, February 27, 2023 6:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Q'Vinc Asberry

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Letter I-292

Q'Vinc Asberry
February 27, 2023

I-292.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Q Asberry <qasberry@gmail.com>
Sent: Monday, February 27, 2023 6:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive s

Q'Vinc Asberry

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Letter I-293

Q'Vinc Asberry
February 27, 2023

I-293.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Richard Arvizu <richarvizu@gmail.com>
Sent: Monday, February 27, 2023 6:10 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Sent from my iPhone

Letter I-294

Richard Arvizu
February 27, 2023

I-294.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Richard Arvizu <richarvizu@gmail.com>
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The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Sent from my iPhone

Letter I-295

Richard Arvizu
February 27, 2023

I-295.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

INTENTIONALLY LEFT BLANK

From: Richard Arvizu <richarvizu@gmail.com>
Sent: Monday, February 27, 2023 6:10 PM
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Sent from my iPhone

Letter I-296

Richard Arvizu
February 27, 2023

I-296.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Richard Arvizu <richarvizu@gmail.com>
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The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in vario

Sent from my iPhone

Letter I-297

Richard Arvizu
February 27, 2023

I-297.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: Richard Arvizu <richarvizu@gmail.com>
Sent: Monday, February 27, 2023 6:10 PM
To: Dan Fairbanks
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As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding ar

Sent from my iPhone

Letter I-298

Richard Arvizu
February 27, 2023

I-298.1 This comment letter is a truncated version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

INTENTIONALLY LEFT BLANK

From: Richard Arvizu <richarvizu@gmail.com>
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I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive s

Sent from my iPhone

Letter I-299

Richard Arvizu
February 27, 2023

I-299.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Richard Arvizu <richarvizu@gmail.com>
Sent: Monday, February 27, 2023 6:10 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

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I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Sent from my iPhone

Letter I-300

Richard Arvizu
February 27, 2023

I-300.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

INTENTIONALLY LEFT BLANK

From: Richard Arvizu <richarvizu@gmail.com>
Sent: Monday, February 27, 2023 6:10 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what univer

Sent from my iPhone

Letter I-301

Richard Arvizu
February 27, 2023

I-301.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Roger Reaney <r.reaney17@gmail.com>
Sent: Monday, February 27, 2023 6:16 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Roger Reaney
20 year Riverside Resident

Sent from Roger's iPhone

Letter I-302

Roger Reaney
February 27, 2023

I-302.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Roger Reaney <r.reaney17@gmail.com>
Sent: Monday, February 27, 2023 6:17 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

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The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what univer

Roger Reaney
20 Year Riverside resident

Sent from Roger's iPhone

Letter I-303

Roger Reaney
February 27, 2023

I-303.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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Comment Letter I-304

From: Shan Dadlez <sdadlez@gmail.com>
Sent: Monday, February 27, 2023 9:28 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-304.1

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database
2. Climate change with additional drought and water reduction must be considered. I-304.2

Sincerely,
Shannon Dadlez

Letter I-304

Shannon Dadlez
February 27, 2023

I-304.1 This comment is truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

I-304.2 This comment requests the Draft EIR consider climate change with additional drought and water reductions. The Project Water Supply Assessment (Appendix O) evaluated water availability to serve the Project in a multiple-dry year situation. As such, drought conditions were considered in the environmental analysis within the Draft EIR. The development will comply with the existing March JPA irrigation efficiency ordinance and is planned to provide landscape irrigation through use of reclaimed water. Climate change is also considered within Section 4.7, Greenhouse Gas Emissions, of the Draft EIR. This comment does not raise any specific issues, questions or concerns about the environmental analysis included in the Draft EIR, as such no further response is provided.

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From: Shan Dadlez <sdadlez@gmail.com>
Sent: Monday, February 27, 2023 9:31 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-305.1

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various locations.

Strong research on the effects of trucks' exhaust exists. We community members did not relocate to this region to have the problems we left follow us. Riverside's air quality has improved over the past 30 years; having additional truck exhaust would set these improvements back drastically. I-305.2

Our community does not want our airt quality further impacted. Relocate your plans for extensive warehouses in an undeveloped location.

SIncerely,

Shannon Dadlez, Ph. D.

Letter I-305

Shannon Dadlez
February 27, 2023

I-305.1 This comment is truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-305.2 This comment expresses concerns regarding truck exhaust. The health effects of Project truck traffic were evaluated in the Revised Health Risk Assessment Technical Report (Appendix C-2). As stated therein, emissions associated with Project truck traffic would not exceed SCAQMD-established thresholds, and as such, impacts would be less than significant.

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From: Sean Walsh <swalsh_7@yahoo.com>
Sent: Monday, February 27, 2023 5:47 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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Letter I-306

Sean Walsh
February 27, 2023

I-306.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Sean Walsh <swalsh_7@yahoo.com>
Sent: Monday, February 27, 2023 5:49 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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Sean Walsh
20821 Indigo Pt
Riverside CA

Letter I-307

Sean Walsh
February 27, 2023

I-307.1 This comment letter is a truncated version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Sean Walsh <swalsh_7@yahoo.com>
Sent: Monday, February 27, 2023 5:49 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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The Aesthetics section of the draft EIR holds an arbitrary standard of significance.

Sean Walsh
20821 Indigo Pt
Riverside CA

Letter I-308

Sean Walsh
February 27, 2023

I-308.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Tanya Ayon <ayontanya@yahoo.com>
Sent: Monday, February 27, 2023 9:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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Sent from my iPhone

Letter I-309

Tanya Ayon
February 27, 2023

I-309.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Tony Harkness <dirtytony82@yahoo.com>
Sent: Monday, February 27, 2023 8:23 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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Sent from my iPhone

Letter I-310

Tony Harkness
February 27, 2023

I-310.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Tony Harkness <dirtytony82@yahoo.com>
Sent: Monday, February 27, 2023 8:23 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

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The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Sent from my iPhone

Letter I-311

Tony Harkness
February 27, 2023

I-311.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Tony Harkness <dirtytony82@yahoo.com>
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Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in vario

Sent from my iPhone

Letter I-312

Tony Harkness
February 27, 2023

I-312.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Tony Harkness <dirtytony82@yahoo.com>
Sent: Monday, February 27, 2023 8:23 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive s

Sent from my iPhone

Letter I-313

Tony Harkness
February 27, 2023

I-313.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Tony Harkness <dirtytony82@yahoo.com>
Sent: Monday, February 27, 2023 8:23 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what univer

Sent from my iPhone

Letter I-314

Tony Harkness
February 27, 2023

I-314.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Tony Harkness <dirtytony82@yahoo.com>
Sent: Monday, February 27, 2023 8:23 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Sent from my iPhone

Letter I-315

Tony Harkness
February 27, 2023

I-315.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: TOM PARKINSON <tbckp@aol.com>
Sent: Monday, February 27, 2023 10:27 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,MPOrqI0KreQh8uZAnwdOEyGoqQJ3m6s3lM_eCgmT5qqWpTrMCQGZd8mVhyUzi9yQc5R3pNs7dra0l-0VWxT9ee57XzrCtvwWE1x6gsfcNmc,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,u5g7o_DyfBI6kjRdghnwCKzJlG-gOib5tR3nICQjEriNzcH6HTteP1JAZkc6BgjKk2bNstX6ohjEF-wRrsK6G7PxUPg8KjNdmuSCCyPfUE_74FXy7loZO1Hlcw,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Tom and Brenda Parkinson. 20646 Gelman dr. 28 year resident of Orangecrest. 92508.

Sent from Brenda's IPhone

Letter I-316

Tom & Brenda Parkinson
February 27, 2023

I-316.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: TOM PARKINSON <tbckp@aol.com>
Sent: Monday, February 27, 2023 10:33 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

I-317.1

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,gPP2ZnA31oas-BPvj9O6xewh0DnKYOEfgOhHjDZLe-E2ygSmGtj3ZK7VAvNcFamTXn4XXC-qdfuTWnZPhGtcXL6wS3J5hR3i-SOZoGN6CQ,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,C_3t-EbVtPDBP51WE5QQsw6aWoUYewLE6LuBWi01Isc8QOwXw-YTc3XdaP4sp5hg20z1bn8XS2YB_oopFKM6VDo5jgDgE0FaFe-2ltuE2VdsDCAfdCVlIMANOtQ,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

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Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

I-317.1 Cont.

Tom and Brenda Parkinson. 20646 Gelman dr. 28 year resident of Orange crest. We have paid our dues. We're already surrounded in three sides by these warehouses Trucks are polluting the air, . Streets are crumbling even more. No more please.

I-317.2

Sent from Brenda's IPhone

Letter I-317

Tom & Brenda Parkinson
February 27, 2023

I-317.1 This comment is identical to Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

I-317.2 This comment expresses opposition to the Project. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR.

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From: TOM PARKINSON <tbckp@aol.com>
Sent: Monday, February 27, 2023 10:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

I-318.1

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. I-318.1 Cont.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Tom and Brenda Parkinson. 20646 Gelman Dr., 925-0828 year resident of Orange crest what was once a piece of the American dream is now been trampled under heavy duty truck traffic. I drive Van Buren and Cactus daily and whenever I'm on the road, I see more semi trucks than cars especially at especially 1 o'clock in the morning or later. Van Buren and our community roads are crumbling under the weight of these trucks running 24 seven. Our air becomes even more hazardous. I-318.2

Sent from Brenda's IPhone

Letter I-318

Tom & Brenda Parkinson
February 27, 2023

I-318.1 This comment is identical to Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-318.2 This comment raises concerns about increased truck traffic, roadway damage, and air quality. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[1] The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Recirculated Section 4.2, Air Quality, has applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR.

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

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From: TOM PARKINSON <tbckp@aol.com>
Sent: Monday, February 27, 2023 10:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,Yo-BJcgParTtuoWV7aoBQkbWeZ_nX8O2Y4F1J3XWdi1NoHIJAe4YFUHTzWfAjzWLnV8MlzmC_NtPrLQz-o9QXGplOKD76E-A65Sshe8Y7A,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

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It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

<include name, address, email in signature line>

Sent from Brenda's IPhone

Letter I-319

Tom & Brenda Parkinson
February 27, 2023

I-319.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: TOM PARKINSON <tbckp@aol.com>
Sent: Monday, February 27, 2023 10:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,xA2OLfv5Lj0FaYwunSsRV6u_l85AT-0fMgV2TjnNu2JRV-LUmHxB94bQWND1784n2ld20HSl25zNhMz7vxYKAcvTLgP3NdOPscqqZTYUkYObkw6WxA,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,uNLXF22KaBK_f2PALkThpSn-jSd_TqJHoKov4_wtvnKEeSfsRx_R9CcreswvImh3AgPI9LWorgyUeFOMHMMj-wsddRd4U-TdX3yfuYTbig,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

<include name, address, email in signature line>

Sent from Brenda's IPhone

Letter I-320

Tom & Brenda Parkinson
February 27, 2023

I-320.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Ying Shen <yingyingshen@hotmail.com>
Sent: Monday, February 27, 2023 11:19 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

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Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Ying Shen
8320 Clover Creek Rd.
Riverside CA 92508
yingyingshen@hotmail.com

Letter I-321

Ying Shen
February 27, 2023

I-321.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: amaharris12 <amaharris12@gmail.com>
Sent: Tuesday, February 28, 2023 6:08 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Letter I-322

amaharris12@gmail.com
February 28, 2023

I-322.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: amaharris12 <amaharris12@gmail.com>
Sent: Tuesday, February 28, 2023 6:08 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

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Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive s

Letter I-323

amaharris12@gmail.com
February 28, 2023

I-323.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: amaharris12 <amaharris12@gmail.com>
Sent: Tuesday, February 28, 2023 6:08 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding ar

Letter I-324

amaharris12@gmail.com
February 28, 2023

I-324.1 This comment letter is a truncated version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: amaharris12 <amaharris12@gmail.com>
Sent: Tuesday, February 28, 2023 6:08 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

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The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Letter I-325

amaharris12@gmail.com
February 28, 2023

I-325.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: amaharris12 <amaharris12@gmail.com>
Sent: Tuesday, February 28, 2023 6:08 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what univer

Letter I-326

amaharris12@gmail.com
February 28, 2023

I-326.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: amaharris12 <amaharris12@gmail.com>
Sent: Tuesday, February 28, 2023 6:08 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Letter I-327

amaharris12@gmail.com
February 28, 2023

I-327.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Tuesday, February 28, 2023 11:34 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would sit over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs, as we all know, most of the jobs will be lost to robots. So in reality there will not be 2,600 new jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and

Letter I-328

Ann & Dolores Marchand
February 28, 2023

I-328.1 This comment letter is a slightly modified version Form Letter F – Jobs, adding the following italicized language to the second paragraph: "The justification for this widely opposed project appears to be the creation of 2,600 jobs*, as we all know, most of the jobs will be lost to robots. So in reality there will not be 2,600 new jobs*." While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. In response to the remainder of this comment, please see Form Letter F Response.

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From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Tuesday, February 28, 2023 11:48 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

I-329.1

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. I-329.1 Cont.

We personally take this matter very seriously as our backyard is Alessandro and I can attest to trucks driving up and down Alessandro without a care in the world. Our house shakes, we have more cracks in our cement and the exterior of our home has cracks from the trucks when they thunder down the road. It never fails that when I'm on Van Buren I see trucks where trucks have been restricted, and I am not talking about the trucks that have a legal right to be in the area. The residents shouldn't have to be the ones who suffer. I-329.2

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Ann & Dolores Marchand
6193 Academy Avenue
Riverside CA 92506
ann.marchand1@gmail.com

Letter I-329

Ann & Dolores Marchand
February 28, 2023

I-329.1 This comment is the same as Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-329.2 This comment raises concerns about existing truck traffic using Alessandro Boulevard and Van Buren Boulevard. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

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From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Tuesday, February 28, 2023 11:54 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Ann & Dolores Marchand
6193 Academy Avenue
Riverside CA 92506
ann.marchand1@gmail.com

Letter I-330

Ann & Dolores Marchand
February 28, 2023

I-330.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Tuesday, February 28, 2023 12:01 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? **The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density**. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Ann & Dolores Marchand
6193 Academy Avenue
Riverside CA 92506
ann.marchand1@gmail.com

Letter I-331

Ann & Dolores Marchand
February 28, 2023

I-331.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Tuesday, February 28, 2023 12:16 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Ann & Dolores Marchand
6193 Academy Avenue
Riverside CA 92506
ann.marchand1@gmail.com

Letter I-332

Ann & Dolores Marchand
February 28, 2023

I-332.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Tuesday, February 28, 2023 12:34 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Ann & Dolores Marchand
6193 Academy Avenue

Riverside CA 92506
ann.marchand1@gmail.com

Letter I-333

Ann & Dolores Marchand
February 28, 2023

I-333.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Tuesday, February 28, 2023 12:41 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, **millions of square feet of boxy, concrete buildings** will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Ann & Dolores Marchand
6193 Academy Avenue
Riverside CA 92506

Letter I-334

Ann & Dolores Marchand
February 28, 2023

I-334.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Tuesday, February 28, 2023 12:49 PM
To: Dan Fairbanks
Subject: Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I would also like to add that we have been residents for over 30 years, and never once was this ever brought to our attention. Shouldn't the residents at least have been notified and informed about what the March JPA was planning to do for the last 20+ years? Not in my wildest dreams could I have imagined that we would be fighting for the health and welfare of my mother, myself and our community. I-335.1

Thank you for allowing us to comment on your project.

Ann & Dolores Marchand
6193 Academy Avenue
Riverside CA 92506
ann.marchand1@gmail.com

On Tue, Feb 28, 2023 at 12:01 PM Ann Marchand <ann.marchand1@gmail.com> wrote:

> Dear Mr. Fairbanks:
>
> Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.
>
> As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? **The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density**. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. I-335.2
>
> Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-335.2
Cont.

Thank you for letting me comment on your project.

Sincerely,

Ann & Dolores Marchand
6193 Academy Avenue
Riverside CA 92506
ann.marchand1@gmail.com

Letter I-335

Ann & Dolores Marchand
February 28, 2023

I-335.1 This comment questions public notification regarding the March JPA's intent regarding development of the Project site. As explained in Recirculated Section 4.10, Land Use and Planning, since the March JPA General Plan was adopted in 1996, the Project site has been designated for development. This comment does not raise any specific issues, questions or concerns about the analysis in the Draft EIR. As such, no further response is provided.

I-335.2 This comment is the same as Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Jennifer Zamora <jen.zamorarios@gmail.com>
Sent: Tuesday, February 28, 2023 2:56 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in vario

Sent from my iPhone

Letter I-336

Jennifer Zamora
February 28, 2023

I-336.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Jennifer Zamora <jen.zamorarios@gmail.com>
Sent: Tuesday, February 28, 2023 2:57 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Sent from my iPhone

Letter I-337

Jennifer Zamora
February 28, 2023

I-337.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Jennifer Zamora <jen.zamorarios@gmail.com>
Sent: Tuesday, February 28, 2023 2:57 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Sent from my iPhone

Letter I-338

Jennifer Zamora
February 28, 2023

I-338.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Jennifer Zamora <jen.zamorarios@gmail.com>
Sent: Tuesday, February 28, 2023 2:57 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in vario

Sent from my iPhone

Letter I-339

Jennifer Zamora
February 28, 2023

I-339.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: Jennifer Zamora <jen.zamorarios@gmail.com>
Sent: Tuesday, February 28, 2023 2:57 AM
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As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding ar

Sent from my iPhone

Letter I-340

Jennifer Zamora
February 28, 2023

I-340.1 This comment letter is a truncated version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

INTENTIONALLY LEFT BLANK

From: Jennifer Zamora <jen.zamorarios@gmail.com>
Sent: Tuesday, February 28, 2023 2:57 AM
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I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive s

Sent from my iPhone

Letter I-341

Jennifer Zamora
February 28, 2023

I-341.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

INTENTIONALLY LEFT BLANK

From: Jennifer Zamora <jen.zamorarios@gmail.com>
Sent: Tuesday, February 28, 2023 2:57 AM
To: Dan Fairbanks
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I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Sent from my iPhone

Letter I-342

Jennifer Zamora
February 28, 2023

I-342.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

INTENTIONALLY LEFT BLANK

From: Jennifer Zamora <jen.zamorarios@gmail.com>
Sent: Tuesday, February 28, 2023 2:57 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what univer

Sent from my iPhone

Letter I-343

Jennifer Zamora
February 28, 2023

I-343.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

INTENTIONALLY LEFT BLANK

From: Karen Bartell <kjbartell@sbcglobal.net>
Sent: Tuesday, February 28, 2023 4:22 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Sent from my iPhone

Letter I-344

Karen Bartell
February 28, 2023

I-344.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

INTENTIONALLY LEFT BLANK

From: Karen Bartell <kjbartell@sbcglobal.net>
Sent: Tuesday, February 28, 2023 4:22 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

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Sent from my iPhone

Letter I-345

Karen Bartell
February 28, 2023

I-345.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Karen Bartell <kjbartell@sbcglobal.net>
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Sent from my iPhone

Letter I-346

Karen Bartell
February 28, 2023

I-346.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Karen Bartell <kjbartell@sbcglobal.net>
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Sent from my iPhone

Letter I-347

Karen Bartell
February 28, 2023

I-347.1 This comment letter is a truncated version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Karen Bartell <kjbartell@sbcglobal.net>
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Sent from my iPhone

Letter I-348

Karen Bartell
February 28, 2023

I-348.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Karen Bartell <kjbartell@sbcglobal.net>
Sent: Tuesday, February 28, 2023 4:22 PM
To: Dan Fairbanks
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Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Sent from my iPhone

Letter I-349

Karen Bartell
February 28, 2023

I-349.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

INTENTIONALLY LEFT BLANK

From: Karen Bartell <kjbartell@sbcglobal.net>
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To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what univer

Sent from my iPhone

Letter I-350

Karen Bartell
February 28, 2023

I-350.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

INTENTIONALLY LEFT BLANK

From: Carney, Kevin P. <KCarney@socalgas.com>
Sent: Tuesday, February 28, 2023 8:54 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-351.1

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. That area is home to the Thompson Kangaroo Rat, the Blue-Gray Gnat Catcher, and Bell's Lesser Virio. Building warehouses on their habitat would be unthinkable. I-351.2

Thank you,
Kevin Carney
8268 Laurel Ridge Rd, Riverside

Letter I-351

Kevin Carney
February 28, 2023

I-351.1 This comment is a condensed version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

I-351.2 This comment states that the Project would result in a loss of habitat area for the Thompson Kangaroo Rat, the Blue-Gray Gnat Catcher, and Bell's Lesser Virio. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), since there is not a species known as Thompson Kangaroo Rat, it is assumed the commenter is referring to Stephens' Kangaroo Rat. This species is presumed present on the Project site. As presented in Section 4.3, Biological Resources, of the Draft EIR, Project impacts on this species were addressed as part of the March Air Force Base closure USFWS Section 7 consultation (BO 1-6-99-F-13) and CBD Settlement Agreement (S.D. Cal. No. 09-cv-1854-JAH-POR). Pursuant to those agreements, 664 acres of lands were placed into conservation easement to offset potential species habitat losses due to development of project site and other 'developable lands'. Additionally, the CDFW reviewed the USFWS BO decision and issued a consistency determination (2080-1999-056-6) stating that "Biological Opinion No. 1- 6-99-F-13 is consistent with the California Endangered Species Act (CESA) as to anticipated take of the least Bell's vireo and Stephens' kangaroo rat" (CDFW 1999). Additionally, the USFWS and CDFW confirmed in 2006 that the areas taken out of the "Stephens' kangaroo rat management area" were no longer part of the core reserve and incidental take was authorized within these areas pursuant to the HCP (USFWS/CDFG WRIV-3259.5). The existing Conservation Easement will be expanded to include the Upper Plateau Conservation area acreage. Funding will be established by the Developer upon the expansion of the existing Conservation Easement. Thus, incidental take of Stephens' kangaroo rat on the Project site is permitted and destruction of occupied habitat has been adequately addressed with the responsible agencies.

Blue-gray gnatcatcher is a common species found across the majority of the entire United States and is known from the Project site. Blue-gray gnatcatcher is not considered a special-status species. Regardless, implementation of the Project's mitigation measures, such as MM-BIO-1 (Best Management Practices), would also reduce impacts to the blue-gray gnatcatcher. (Appendix D-2)

Since there is not a species known as Bell's Lesser Virio, it is assumed the commenter is referring to least Bell's vireo. Surveys for least Bell's vireo were performed in accordance with USFWS protocols. The surveys were negative for least Bell's vireo on the Project site. Least Bell's vireo were found to inhabit several drainages adjacent to the Project site. With implementation of MM-BIO-2 (Least Bell's Vireo) to avoid and/or minimize indirect noise impacts on nesting least Bell's vireo, the proposed Project's impacts would be less than significant. (Appendix D-2)

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From: Carney, Kevin P. <KCarney@socalgas.com>
Sent: Tuesday, February 28, 2023 12:08 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-352.1

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000. We already have trucks daily disregarding the laws and traveling on Trautwein, Alessandro, and Van Buren where trucks are prohibited. Now with Barton extended into residential neighborhoods we will have truck driving through our neighborhood because we already know they don't obey traffic laws. Please don't destroy our city! I-352.2

Kevin Carney

8268 Laurel Ridge Rd, RIverside

Letter I-352

Kevin Carney
February 28, 2023

I-352.1 This comment is a condensed version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-352.2 This comment raises concerns about existing truck traffic using Trautwein, Alessandro Boulevard and Van Buren Boulevard. The comment also expresses concerns about truck traffic through neighborhoods with the extension of Barton. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

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From: K Doty <dkdoty2@gmail.com>
Sent: Tuesday, February 28, 2023 5:24 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,wh0_MnumvhGr4MKdeHtLLR3vD_UahB1bFGtQHMENXbnKh6kdrOzLbwlDlC4APHkM2-R1wJNIdVP61tQ_ALZRvENewiypNhGXBPRNvfghVpmN&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone

(https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,7q3vrlHN0hxJz7NPHk7GLenToQlDRwErY0RqoVxMOmb8Sx-bjRUCn0bvu6Ylb8ze9PxF34IjtiSBnIEnFlEkYlYcZFkKiGZvbetxDWys&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

K.Doty
8805 Morninglight Circle
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-353

K Doty
February 28, 2023

I-353.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Kevin Heinemann <kevinheinemann@gmail.com>
Sent: Tuesday, February 28, 2023 8:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. I-354.1

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I am very concerned about what chemicals and pollution will be kicked up into the air when the nuclear weapons storage bunkers are demolished. I-354.2

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I-354.3

Thank you for the opportunity to comment.

Sincerely,

Kevin Heinemann
8715 Morninglight Cir
Riverside, CA 92508
kevinheinemann@gmail.com

Letter I-354

Kevin Heinemann
February 28, 2023

I-354.1 This comment is the same as Form Letter B – Air Quality, with the omission of the next to the last paragraph of the form letter. As such, in response to this comment, please see Form Letter B Response.

I-354.2 This comment expresses concern about release of hazardous materials when the Weapons Storage Area bunkers are demolished. In response to this comment, please see Recirculated Section 4.8, Hazards and Hazardous Materials and Topical Response 3 – Hazards.

I-354.3 This comment is the conclusion of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Luis Rodriguez <byr.luis@gmail.com>
Sent: Tuesday, February 28, 2023 5:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Letter I-355

Luis Rodriguez
February 28, 2023

I-355.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Luis Rodriguez <byr.luis@gmail.com>
Sent: Tuesday, February 28, 2023 5:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Letter I-356

Luis Rodriguez
February 28, 2023

I-356.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Luis Rodriguez <byr.luis@gmail.com>
Sent: Tuesday, February 28, 2023 5:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in vario

Letter I-357

Luis Rodriguez
February 28, 2023

I-357.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Luis Rodriguez <byr.luis@gmail.com>
Sent: Tuesday, February 28, 2023 5:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding ar

Letter I-358

Luis Rodriguez
February 28, 2023

I-358.1 This comment letter is a truncated version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Luis Rodriguez <byr.luis@gmail.com>
Sent: Tuesday, February 28, 2023 5:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive s

Letter I-359

Luis Rodriguez
February 28, 2023

I-359.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Luis Rodriguez <byr.luis@gmail.com>
Sent: Tuesday, February 28, 2023 5:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Letter I-360

Luis Rodriguez
February 28, 2023

I-360.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Luis Rodriguez <byr.luis@gmail.com>
Sent: Tuesday, February 28, 2023 5:59 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what univer

Letter I-361

Luis Rodriguez
February 28, 2023

I-361.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Melissa Zimmerman <zimmermanmelissa77@gmail.com>
Sent: Tuesday, February 28, 2023 7:08 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. Many people enjoy spending time in the outdoors in the space. Now is the time to make this space a preserve, protecting the natural areas that are a important part of our city.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Melissa Zimmerman
20678 Iris Canyon Road
Riverside CA 92508

Letter I-362

Melissa Zimmerman
February 28, 2023

I-362.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Nicole Bernas <onecosmiclove@icloud.com>
Sent: Tuesday, February 28, 2023 1:50 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? Do we need to show you a photoshopped idea of what the warehouses will look like?? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-363.1

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is *misleading* to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are not based in reality and are misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs (which do not support the housing prices and will in time be taken by A.I) in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty, oxygen and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

I-363.1 Cont.

I-363.2

I-363.3

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please do not allow one final grand act of poor land use planning be your lasting legacy. Please create a beautiful legacy for us and our children: a town-center, community garden, community center, more open space- ANYTHING is better than more industrial business parks and mega warehouses. I await your detailed response. Thank you.

I-363.4

Sincerely,

Nicole Bernas
19981 St Francis Dr. 92508
OneCosmicLove@icloud.com

Letter I-363

Nicole Bernas
February 28, 2023

I-363.1 This comment is a variation on Form Letter A – Aesthetics, including non-substantive revisions and adding the following to the third paragraph: "Do we need to show you a photoshopped idea of what the warehouses will look like??" The text modifications in this version of Form Letter A do not raise any new or different issues, questions or concerns about the environmental analysis within the Draft EIR. As such, in response to this comment, please see Form Letter A Response.

I-363.2 This comment suggests the jobs generated by the Project would not support housing prices and will be replaced by automation. Wage ranges and housing prices are outside the scope of CEQA environmental review. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

I-363.3 This comment identifies oxygen and aesthetics as a benefit provided by the Project site. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land. Table 4.3-7, Vegetation Communities and Land Uses Project Impacts Within the Study Area, of the Draft EIR identifies the types and acreage of vegetation communities that would be impacted by the development of the Project. MM-BIO-8 (Upland Vegetation Communities) requires Project impacts on encelia scrub (1.53 acres) flat-topped buckwheat (4.56 acres), Riversidean sage scrub (5.54 acres) be mitigated at a 1:1 ratio, and Project impacts on Riversidean sage scrub – disturbed (4.05 acres) will be mitigated at a 0.5:1 ratio through the purchase of 13.66 acres of coastal or Riversidean sage scrub credits at an approved mitigation bank. Section 4.5, Landscape Design Guidelines, of the proposed Specific Plan requires landscaping "presenting a combination of evergreen and deciduous trees, low shrubs, and masses of groundcovers to create a visually pleasing experience for pedestrians and passing motorists."

I-363.4 This comment expresses opposition to the Project. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR.

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From: Nancy Magi <troutquilt@sbcglobal.net>
Sent: Tuesday, February 28, 2023 9:48 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Riverside's freeways and surface streets are MAXED OUT. We need time for our roads to catch up with the traffic the warehouses are being to our community. Stop!

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How

might the traffic study change if actual (versus the “ideal”) traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Nancy Magi, Ward 3, Riverside
Sent from my iPhone

Letter I-364

Nancy Magi
February 28, 2023

I-364.1 This comment letter is a variation on Form Letter G – Traffic, adding the following to the introduction: "Riverside's freeways and surface streets are MAXED OUT. We need time for our roads to catch up with the traffic the warehouses are being to our community. Stop!" The text modifications in this version of Form Letter G do not raise any new or different issues, questions or concerns about the environmental analysis within the Draft EIR. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Rachel Lathan <rachellathan0512@gmail.com>
Sent: Tuesday, February 28, 2023 5:05 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding ar

Letter I-365

Rachel Lathan
February 28, 2023

I-365.1 This comment letter is a truncated version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

INTENTIONALLY LEFT BLANK

From: Rachel Lathan <rachellathan0512@gmail.com>
Sent: Tuesday, February 28, 2023 5:05 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in vario

Letter I-366

Rachel Lathan
February 28, 2023

I-366.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: sfahrney9@gmail.com
Sent: Tuesday, February 28, 2023 10:37 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I am writing to thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-367.1

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Additionally, this is not the best use of this land. Warehouses are like huge megaliths that devalue the scenic view, cannot really be replaced once built, do not provide that many permanent jobs or that much tax/economic benefit to the surrounding area, and result not only in increased air pollution but also more greenhouse gases. You can do better! I-367.2

Please open up your lens to consider a better use of this land for the environment, the community, and quality of life for all. I-367.3

Sincerely,

Susan Fahrney

Susan Fahrney, MPH
Sfahrney9@gmail.com

Letter I-367

Susan Fahrney
February 28, 2023

I-367.1 This comment is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

I-367.2 This comment raises aesthetic concerns about the Project. In response to this comment, please see Topical Response 1 – Aesthetics.

I-367.3 This comment raises general concerns about increased air pollution and greenhouse gases, and general opposition to the Project. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments, specifically within Recirculated Section 4.2, Air Quality. In response to this comment, please see Recirculated Section 4.2, Air Quality.

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Comment Letter I-368

From: Tinka <tinkafriend@sbcglobal.net>
Sent: Tuesday, February 28, 2023 11:58 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I am a 71 retired special education public school teacher who has lived in the Corona-Riverside are since 1975. Many of the special-needs elementary students that I worked with over my 40 years of teaching often had multiple health issues, including respiratory difficulties. I am concerned about the deteriorating air quality as the result of more distribution trucks and warehouses in the Inland Empire, especially by Riverside. I-368.1

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. I-368.2

Please provide any analysis that you may have. Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect. I can not image that this is accurate.

Thank you for your time. I await your reply on how this warehouse project and subsequent distribution trucks WILL NOT impact the respiratory health of children living and attending school nearby. I-368.3

Tinka Friend
Retired Teacher
10483 Killarney Drive, Riverside, CA 92503

Letter I-368

Tinka Friend
February 28, 2023

I-368.1 This comment is introductory in nature and expresses concerns about air quality. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments specifically within Recirculated Section 4.2, Air Quality. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR.

I-368.2 This comment is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

I-368.3 This comment raises concerns regarding the Project's impacts to the respiratory health of children. The Draft EIR assessed the Project's health risks in Recirculated Section 4.2, Air Quality, and Appendix C-2 assess the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks.

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From: Tinka <tinkafriend@sbcglobal.net>
Sent: Tuesday, February 28, 2023 12:21 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I am a 71 year old retired special education public school teacher who has lived in the Corona-Riverside are since 1975. Many of the special-needs elementary students that I worked with over my 40 years of teaching often had multiple health issues, including respiratory difficulties. I am concerned about the deteriorating air quality as the result of more distribution trucks and warehouses in the Inland Empire, especially in/nearby Riverside. I-369.1

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-369.2

The project applicant conceded that there will be **"significant and unavoidable" air quality impacts** on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various locations.

What are the mitigation plans for the young children with compromised respiratory systems living and attending school nearby these warehouses? Are they just expected to stay indoors and not go outside to play----as every 7-year old child should be able to do? What will the lack of exercise do to their developing bodies? Will these warehouses build an indoor playground/community center for the nearby neighborhoods to allow them to play and exercise despite the "significant and unavoidable" air quality impacts? I-369.3

When you struggle to breathe, "significant and unavoidable" negative air quality has a serious impact on your quality of life. I await your response on what is specifically going to be done to mitigate the "significant and unavoidable" negative effects on the children living and attending school nearby. These children can not be expected to suffer for the financial benefits of this proposed project.

Tinka Friend
10483 Killarney Drive, Riverside, CA 92503

Letter I-369

Tinka Friend
February 28, 2023

I-369.1 This comment is introductory in nature and expresses concerns about air quality. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments, specifically within Recirculated Section 4.2, Air Quality. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR.

I-369.2 This comment is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-369.3 This comment requests mitigation plans for children with compromised respiratory systems. To evaluate the potential adverse effects on children (as well as all surrounding residences), both construction and operational Health Risk Assessments were prepared. As discussed in Recirculated Section 4.2, Air Quality, neither the Project's construction nor operational air emissions would exceed the agency-established thresholds for significant human health or cancer risk.

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From: Cindy Camargo <camargo@marchjpa.com>
Sent: Tuesday, February 28, 2023 8:21 AM
To: Dr. Grace Martin; Dan Fairbanks
Subject: FW: March JPA - West Campus Upper Plateau Comment Submit

FYI -

Cindy Camargo, CAP
Executive Assistant & Notary Public
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
951-656-7000 [Office]
951-288-3548 [Cell]
March JPA – FTZ #244 Grantee
camargo@marchjpa.com
www.marchjpa.com
www.marchinlandport.ca

From: March JPA <info@marchjpa.com>
Sent: Tuesday, February 28, 2023 8:10 AM
To: mjpawestmarch@marchjpa.com; Info <info@marchjpa.com>; info@marchjpa.org
Subject: March JPA - West Campus Upper Plateau Comment Submit

Name: William Schenck
Email: wpscompute@hotmail.com
Message: I find the project well considered with mitigation for the increased development with open space as well as additional dedicated park space. The am happy to see that the planned development separated Barton Road from a connection with Cactus Ave. This will keep the truck traffic heading to the freeway instead of through the local neighborhoods. The existing warehouses have benefitted my family with jobs for my children. I would fully support this project.

I-370.1

Letter I-370

William Schenck
February 28, 2023

I-370.1 The comment expresses support for the Project and does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR.

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From: Berenice Dixon <tb2truedixons@yahoo.com>
Sent: Tuesday, February 28, 2023 3:31 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
<include name, address, email in signature line>

Berenice Dixon
(951) 550-7773

Letter I-371

Berenice Dixon
February 28, 2023

I-371.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Berenice Dixon <tb2truedixons@yahoo.com>
Sent: Tuesday, February 28, 2023 3:31 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

<include name, address, email in signature line>

Berenice Dixon
(951) 550-7773

Letter I-372

Berenice Dixon
February 28, 2023

I-372.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Berenice Dixon <tb2truedixons@yahoo.com>
Sent: Tuesday, February 28, 2023 3:31 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
<include name, address, email in signature line>

Berenice Dixon
(951) 550-7773

Letter I-373

Berenice Dixon
February 28, 2023

I-373.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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Letter I-374

[NOT USED]

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From: Brenda Parkinson <tbckp@aol.com>
Sent: Tuesday, February 28, 2023 12:26 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies? In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan? As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated, "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred. Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public

I-375.1

comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process. Thank you for letting me comment on your project. Sincerely, Tom and Brenda Parkinson, 20646 Gelman dr.92508. tbckp@aol.com, 28 year residents of Orangecrest. We are being choked to death by all the semi trucks already here. WE HAVE PAID OUR DUES! Please consider another location for this project.

I-375.1 Cont.

I-375.2

Letter I-375

Tom & Brenda Parkinson
February 28, 2023

I-375.1 This comment is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-375.2 This comment expresses concern regarding existing truck traffic and general opposition to the Project. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR.

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From: Dahlia Subaran <iyandrea@hotmail.com>
Sent: Tuesday, February 28, 2023 5:52 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Dahlia Subaran, 8420 Gessay Pl. Riverside, CA 92508, iyandrea@hotmail.com

Letter I-376

Dahlia Subaran
February 28, 2023

I-376.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Drew Ward <drewward75@gmail.com>
Sent: Tuesday, February 28, 2023 8:01 AM
To: Dan Fairbanks
Subject: Warehouse Concerns

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Drew Ward
6360 Manzanita Way
Riverside, CA 92504

Letter I-377

Drew Ward
February 28, 2023

I-377.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Drew Ward <drewward75@gmail.com>
Sent: Tuesday, February 28, 2023 8:02 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Drew Ward
6360 Manzanita Way
Riverside, CA 92504
drew@riverbendcommons.org

Letter I-378

Drew Ward
February 28, 2023

I-378.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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Letter I-379

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From: Drew Ward <drewward75@gmail.com>
Sent: Tuesday, February 28, 2023 8:02 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Drew Ward
6360 Manzanita Way
Riverside, CA 92504
drew@riverbendcommons.org

Letter I-380

Drew Ward
February 28, 2023

I-380.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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Letter I-381

[NOT USED]

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From: Drew Ward <drewward75@gmail.com>
Sent: Tuesday, February 28, 2023 8:02 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Drew Ward
6360 Manzanita Way
Riverside, CA 92504
drew@riverbendcommons.org

Letter I-382

Drew Ward
February 28, 2023

I-382.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Drew Ward <drewward75@gmail.com>
Sent: Tuesday, February 28, 2023 8:03 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Drew Ward
6360 Manzanita Way
Riverside, CA 92504
drew@riverbendcommons.org

Letter I-383

Drew Ward
February 28, 2023

I-383.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Drew Ward <drewward75@gmail.com>
Sent: Tuesday, February 28, 2023 8:03 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Drew Ward
6360 Manzanita Way

Riverside, CA 92504
drew@riverbendcommons.org

Letter I-384

Drew Ward
February 28, 2023

I-384.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Drew Ward <drewward75@gmail.com>
Sent: Tuesday, February 28, 2023 8:03 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Drew Ward
6360 Manzanita Way
Riverside, CA 92504
drew@riverbendcommons.org

Letter I-385

Drew Ward
February 28, 2023

I-385.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Francine Carbajal <fseancalvin@aol.com>
Sent: Tuesday, February 28, 2023 10:36 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have. Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Letter I-386

Francine Carbajal
February 28, 2023

I-386.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Francine Carbajal <fseancalvin@aol.com>
Sent: Tuesday, February 28, 2023 10:36 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive s

Letter I-387

Francine Carbajal
February 28, 2023

I-387.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Francine Carbajal <fseancalvin@aol.com>
Sent: Tuesday, February 28, 2023 10:37 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Letter I-388

Francine Carbajal
February 28, 2023

I-388.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Francine Carbajal <fseancalvin@aol.com>
Sent: Tuesday, February 28, 2023 10:38 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in vario

Letter I-389

Francine Carbajal
February 28, 2023

I-389.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Gisela and Nelson Cuellar <ngcuellar@msn.com>
Sent: Tuesday, February 28, 2023 8:14 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Thank you for your time in reading this concern.

Gisela

Get Outlook for Android

Letter I-390

Gisela & Nelson Cuellar
February 28, 2023

I-390.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: G Z <gzlaket@gmail.com>
Sent: Tuesday, February 28, 2023 5:25 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Good evening. Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Please help keep our community a pleasant home for both citizens and wildlife alike.

Thank you for your time and attention to this matter.

Sincerely,

Gabriella Zlaket
8670 Maroon Peak Way
Riverside, CA 92508

Letter I-391

Gabriella Zlaket
February 28, 2023

I-391.1 This comment letter is an abbreviated version of Form Letter C – Biological Resources and adding the following: "Please help keep our community and pleasant home for both citizens and wildlife alike." The added text does not raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, in response to this comment, please see Form Letter C Response.

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From: G Z <gzlaket@gmail.com>
Sent: Tuesday, February 28, 2023 5:22 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Good evening. I am writing to you as a concerned resident of Riverside. Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. (Please do not allow our air to be further polluted!)

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have. Thank you for your time and attention to this matter.

Sincerely,

Gabriella Zlaket
8670 Maroon Peak Way
Riverside, CA 92508

Letter I-392

Gabriella Zlaket
February 28, 2023

I-392.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Alejandra Dubcovsky <adubcovskyj@gmail.com>
Sent: Wednesday, March 1, 2023 6:44 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Alejandra Joseph
7128 Foxcroft St.

Letter I-393

Alejandra Joseph
March 1, 2023

I-393.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Wednesday, March 1, 2023 7:47 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have. Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16? Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate. Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers. It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project. Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates. Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally. Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023. I spent 10 years working as a top Safety Professional in warehousing and these are not good jobs for most people and employees have high injury rates, burnout, and are pushed at an unsafe pace for low pay.

I-394.1

I-394.2

Sincerely,
Bobby Robinette
Orangecrest 92508

Letter I-394

Bobby Robinette
March 1, 2023

I-394.1 This comment is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

I-394.2 This comment is about the warehouse employee experience. The comment does not raise any issues, questions or concerns about the analysis in the Draft EIR. As such, no further response is provided.

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From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Wednesday, March 1, 2023 7:49 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. Please redo your traffic study to reflect the actual conditions of the surrounding area.

I-395.1

I spent 10 years working as a top Safety Professional in warehousing and these are not good jobs for most people and employees have high injury rates, burnout, and are pushed at an unsafe pace for low pay. Overworked underpaid truck drivers is not what we need traversing our neighborhoods.

I-395.2

Sincerely,
Bobby Robinette
Orangecrest 92508

Letter I-395

Bobby Robinette
March 1, 2023

I-395.1 This comment is a variation of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-395.2 This comment is about the warehouse employee experience and raises concerns regarding trucks in neighborhoods. The warehouse worker comment does not raise any issues, questions or concerns about the analysis in the Draft EIR. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), regarding trucks, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

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From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Wednesday, March 1, 2023 7:52 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site? We would ask for significant mitigations to be put in place to reduce the impacts on local residents. 1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing. I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028. I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I-396.1

I spent 10 years working as a top Safety Professional in warehousing and I challenge you to find one warehouse that enforces their no idling policies and then smell the air on the lot and tell me it's safe.

I-396.2

Sincerely,
Bobby Robinette
Orangecrest 92508

Letter I-396

Bobby Robinette
March 1, 2023

I-396.1 This comment is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-396.2 This comment raises concerns regarding anti-idling enforcement. MM-AQ-17 requires signs restricting idling to 3 minutes and the contact information for the building facilities manager, SCAQMD, and CARB to report violations. MM-AQ-22 requires the facility operator to annually provide tenants, employees and truck drivers information regarding efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. These mitigation measures will be part of the Project's Mitigation Monitoring and Reporting Program, and enforced by the March JPA, and post-2025, the County of Riverside.

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From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Wednesday, March 1, 2023 7:53 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies? In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan? As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated, "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred. Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business

park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process. Thank you for letting me comment on your project. Sincerely,
Bobby Robinette
Orangrecrest 92508

Letter I-397

Bobby Robinette
March 1, 2023

I-397.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Wednesday, March 1, 2023 7:55 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area. Specifically, I would like to ask: 1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section? 2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project? 3. Why were PFAS and perchlorate omitted in soil testing? 4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis? 5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area. Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers. In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm. The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance. As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed Thank you for allowing me to provide comments on this project.

I-398.1

I spent 10 years working as a top Safety Professional in warehousing and even warehouses that try to be green have a lot of hazardous waste still. Leaking oil, trash and debris are common.
Bobby Robinette
Orangecrest 92508

I-398.2

Letter I-398

Bobby Robinette
March 1, 2023

I-398.1 This comment is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

I-398.2 This comment raises concerns regarding hazardous wastes. Recirculated Section 4.8, Hazards and Hazardous Materials, included an analysis of operational impacts from the proposed Project. As stated therein, through compliance with existing regulations governing the use and disposal of chemicals, and with implementation of MM-HAZ-2 (Materials Storage Near School), impacts associated with hazards and hazardous materials during Project operations would be less than significant.

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From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Wednesday, March 1, 2023 7:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Wildlife: 1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB. 2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old. Plant life: 1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life? 2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted. I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced? Thank you for allowing me to provide comments on this project.

Sincerely,
Bobby Robinette
Orangecrest 92508

Letter I-399

Bobby Robinette
March 1, 2023

I-399.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Wednesday, March 1, 2023 7:59 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents. The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

I-400.1

When I moved to my current house 6 years ago, I was lied to and told the land behind my house was protected and nothing would be built. Now I see millions of square feet of disgusting warehouses behind my house sitting behind the first row on Meridian Pkwy. When is it enough? I don't think I will live in this community much longer at this rate and home values will plummet and extra money brought in by the warehouses will be lost with the blight.

I-400.2

Sincerely,

Bobby Robinette
Orangecrest 92508

Letter I-400

Bobby Robinette
March 1, 2023

I-400.1 This comment is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-400.2 This comment raises concerns about the development of West Campus Lower Plateau as well as the proposed Project. The comment expresses general opposition and does not raise any specific issues, questions or concerns about the environmental analysis in the Draft EIR. As such, no further response is provided.

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From: Cynthia Spring <caspring8@hotmail.com>
Sent: Wednesday, March 1, 2023 9:55 AM
To: Dan Fairbanks
Subject: Warehouses

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Cynthia Spring-Pearson
6195 Oswego Drive
Riverside, CA 92506
caspring8@hotmail.com

Letter I-401

Cynthia Spring-Pearson
March 1, 2023

I-401.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

INTENTIONALLY LEFT BLANK

From: Cynthia Spring <caspring8@hotmail.com>
Sent: Wednesday, March 1, 2023 9:56 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Cynthia Spring-Pearson
6195 Oswego Drive
Riverside, CA 92506
caspring8@hotmail.com

Letter I-402

Cynthia Spring-Pearson
March 1, 2023

I-402.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Cynthia Spring <caspring8@hotmail.com>
Sent: Wednesday, March 1, 2023 9:58 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Cynthia Spring-Pearson
6195 Oswego Drive
Riverside, CA 92506
caspring8@hotmail.com

Letter I-403

Cynthia Spring-Pearson
March 1, 2023

I-403.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Cynthia Spring <caspring8@hotmail.com>
Sent: Wednesday, March 1, 2023 9:59 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,
Cynthia Spring-Pearson
6195 Oswego Drive
Riverside, CA 92506
caspring8@hotmail.com

Letter I-404

Cynthia Spring-Pearson
March 1, 2023

I-404.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Cynthia Spring <caspring8@hotmail.com>
Sent: Wednesday, March 1, 2023 9:59 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Cynthia Spring-Pearson
6195 Oswego Drive
Riverside, CA 92506
caspring8@hotmail.com

Letter I-405

Cynthia Spring-Pearson
March 1, 2023

I-405.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Cynthia Spring <caspring8@hotmail.com>
Sent: Wednesday, March 1, 2023 9:59 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Cynthia Spring-Pearson
6195 Oswego Drive

Riverside, CA 92506
caspring8@hotmail.com

Letter I-406

Cynthia Spring-Pearson
March 1, 2023

I-406.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Cynthia Spring <caspring8@hotmail.com>
Sent: Wednesday, March 1, 2023 9:59 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Cynthia Spring-Pearson
6195 Oswego Drive
Riverside, CA 92506
caspring8@hotmail.com

Letter I-407

Cynthia Spring-Pearson
March 1, 2023

I-407.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Erin Swinfard <erin@monstermediaprint.com>
Sent: Wednesday, March 1, 2023 7:45 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I-408.1

This is an important issue to us and our family, community and city!

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

I-408.2

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as

shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-408.2 Cont.

Thank you for letting me comment on your project.

Sincerely,

Erin Swinfard
5378 Jasper Lane
Riverside, CA 92506
erin@monstermediaprint.com

Letter I-408

Erin Swinfard
March 1, 2023

I-408.1 This comment is Form Letter E – Project Consistency, with the addition of the following as an introduction: "This is an important issue to us, and our family, community, and city!" This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, in response to this comment, please see Form Letter E Response.

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From: Jennifer Hernandez <jennykate83@att.net>
Sent: Wednesday, March 1, 2023 8:19 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau Project

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,jRQQkk5UwbAPUXHiwScv06bB67d3ICsKPKWEruJNe8xF5LEX245rbOqpMmdw9R6LffdDqhPXyjTS70kDsA7Rt5hr-lZza_l1sM7qpspYk0U,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,D1skamqbx9pRuDdqpF6YdngzD0LORqA4SFY6zLCZkR_0gx2L53sKyy1fVJHIoztMgsRnDgrB4drETC

Hb1khM48gdM2FsSlEC0U9f-YRt7uA_P1IhBA,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Jennifer Hernandez,
9054 Hope Ave.
Riverside CA 92503.
Jennykate83@att.net

Sent from my iPhone

Letter I-409

Jennifer Hernandez
March 1, 2023

I-409.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: julie weatherford <julieweatherford@gmail.com>
Sent: Wednesday, March 1, 2023 11:06 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). As a lifelong Riverside resident and retired public health professional, I am very concerned about the Project's negative health impacts on residents of surrounding areas. The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-410.1

As a Riverside resident and retired public health professional, I am concerned about negative health effects that the Project will have on residents of surrounding regions due to poor air quality. The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. I-410.2

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site? I-410.3

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I-410.3 Cont.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Julie Weatherford, MPH
2415 Falling Oak Drive
Riverside, CA 92506
julieweatherford@gmail.com

Letter I-410

Julie Weatherford
March 1, 2023

I-410.1 This comment is the introductory paragraph of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-410.2 This comment raises concerns about the health effects related to DPM. Recirculated Section 4.2, Air Quality, and Appendix C-2 assess the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks.

I-410.3 This comment is the same as Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, March 1, 2023 6:45 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. Please listen to those people who will need to live with your decisions for decades. I await your detailed response.

Sincerely,

Kristine Doty
8805 Morninglight Circle
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-411

Kristine Doty
March 1, 2023

I-411.1 This comment letter is Form Letter A – Aesthetics with the addition of the following to the last paragraph: "Please listen to those people who will need to live with your decisions for decades." This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, in response to this comment, please see Form Letter A Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, March 1, 2023 6:46 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Open spaces are fast dwindling and are essential to the health of our community.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
<include name, address, email in signature line>

Sent from my iPhone

Letter I-412

K Doty
March 1, 2023

I-412.1 This comment letter is Form Letter C – Biological Resources with the addition of the following to the second paragraph: "Open spaces are fast dwindling and are essential to the health of our community." This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, in response to this comment, please see Form Letter C Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, March 1, 2023 6:47 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Our open spaces are quickly dwindling and are essential to the health of a community.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Kristy Doty

Sent from my iPhone

Letter I-413

Kristy Doty
March 1, 2023

I-413.1 This comment letter is Form Letter C – Biological Resources with the addition of the following to the second paragraph: "Our open spaces are quickly dwindling and are essential to the health of a community." This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, in response to this comment, please see Form Letter C Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, March 1, 2023 6:50 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Please consider the requests of the community who will be impacted by this project

Sincerely,

K.Doty
8805 Morninglight Circle
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-414

K Doty
March 1, 2023

I-414.1 This comment letter is variation of Form Letter E – Project Consistency and replaces the last sentence with the following: "Please consider the requests of the community who will be impacted by this project." This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, in response to this comment, please see Form Letter E Response.

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From: Leslie Tamppari <leslietamppari@gmail.com>
Sent: Wednesday, March 1, 2023 11:48 AM
To: Dan Fairbanks
Subject: No warehouses in Riverside neighborhoods

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,1xK_fOaq65k7XcQHeOnZdlDugLMdBoAJ2kyiCJxUfl4ROv6IhzShI7A34uyObyurAOdnAZQMbjeA27yx51LTUhJddoMYvHUQoG8zgebp4OJmRQ,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,zWwyl8sjWEtpAupkpxrSGHisz-

NqXyUy2WEUeUxnnwzA9YHQezYVfOqkQslfNqR7DNrSaFMFdFtN_CM7-eh8TwF_xqIptYJ89-3vnSK42Ozy&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
Leslie Tamppari
1721 E Mountain St
Pasadena, CA 91104
Leslietamppari@gmail.com

Sent from my iPhone

Letter I-415

Leslie Tamppari
March 1, 2023

I-415.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Lori Nelson <myohana3@me.com>
Sent: Wednesday, March 1, 2023 12:42 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Lori Nelson
20800 Orchid Way
Riverside CA 92508
Myohana3@me.com

Letter I-416

Lori Nelson
March 1, 2023

I-416.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Lori Nelson <myohana3@me.com>
Sent: Wednesday, March 1, 2023 12:45 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Lori and Chris Nelson
20800 Orchid Way
Riverside CA 92508
Myohana3@me.com

Letter I-417

Lori Nelson
March 1, 2023

I-417.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Tyftun20 <Tyftun20@protonmail.com>
Sent: Wednesday, March 1, 2023 7:42 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.

The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion.

Please provide any analysis that you may have. Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16? Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area.

I think you will find that your job and greenhouse gas assumptions are wildly inaccurate. Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32).

It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect.

This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project. Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035?

Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates. Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful.

Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Maria Estabrooks
92508

Sent from ProtonMail Mobile

Letter I-418

Maria Estabrooks
March 1, 2023

I-418.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Tyftun20 <Tyftun20@protonmail.com>
Sent: Wednesday, March 1, 2023 7:48 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project.

The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small).

Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area?

Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics.

Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based?

I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the “significant and unavoidable” noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit.

This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically.

It is a shameful plan and the community, which I am a part of, demands better of you. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission.

The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come.

Please don’t allow one final grand act of poor land use planning be your lasting legacy.

I await your detailed response.

Sincerely,

Maria Estabrooks
92508

Sent from ProtonMail Mobile

Letter I-419

Maria Estabrooks
March 1, 2023

I-419.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Tyftun20 <Tyftun20@protonmail.com>
Sent: Wednesday, March 1, 2023 7:50 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Wildlife: 1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB. 2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Please redo studies that are more than a year old. Plant life: 1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life? 2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level.

I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence.

The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Maria Estabrooks

92508

Sent from ProtonMail Mobile

Letter I-420

Maria Estabrooks
March 1, 2023

I-420.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Tyftun20 <Tyftun20@protonmail.com>
Sent: Wednesday, March 1, 2023 7:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted.

I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area. Specifically, I would like to ask: 1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section? 2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project? 3. Why were PFAS and perchlorate omitted in soil testing? 4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis? 5. Why was soil testing only included in a few sections of the project construction area?

Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area. Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers.

I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm. The CEQA process requires that the Lead Agency evaluate and disclose environmental risks.

Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Maria Estabrooks
92508

Sent from ProtonMail Mobile

Letter I-421

Maria Estabrooks
March 1, 2023

I-421.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Tyftun20 <Tyftun20@protonmail.com>
Sent: Wednesday, March 1, 2023 7:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections.

It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year.

Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density.

Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents?
Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community

relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v).

In what specific ways have you incorporated Community Preference in the development of your plan? As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses.

The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated, "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred. Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear.

The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol.

The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Maria Estabrooks
92508

Sent from ProtonMail Mobile

Letter I-422

Maria Estabrooks
March 1, 2023

I-422.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Tyftun20 <Tyftun20@protonmail.com>
Sent: Wednesday, March 1, 2023 8:04 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.

The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR.

The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development.

Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund.

At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts.

Can you explain why these mitigations were not considered in the DEIR for this site? We would ask for significant mitigations to be put in place to reduce the impacts on local residents. 1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance

of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing. I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I

am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031.

I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Maria Estabrooks
92508

Sent from ProtonMail Mobile

Letter I-423

Maria Estabrooks
March 1, 2023

I-423.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Tyftun20 <Tyftun20@protonmail.com>
Sent: Wednesday, March 1, 2023 8:07 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built?

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account.

Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project.

I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods.

This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety.

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area.

Thank you!

Sincerely,

Maria Estabrooks
92508

Sent from ProtonMail Mobile

Letter I-424

Maria Estabrooks
March 1, 2023

I-424.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: nancy riverbendcommons.org <nancy@riverbendcommons.org>
Sent: Wednesday, March 1, 2023 7:55 AM
To: Dan Fairbanks
Subject: Please!

As a resident of riverside, I respectfully ask that you do not build permanent concrete behemoth structures so near to resident homes, adding to the overall degradation of our fair city. These structures so close to where we live threaten to pollute, uglify and devalue the homes and property, that we as citizens have worked so hard to invest in and make safe and beautiful for our children. I-425.1

Please!

Thank you,
Nancy Ward MFA - Professor of Design and Illustration CBU

Letter I-425

Nancy Ward
March 1, 2023

I-425.1 This comment expresses general opposition to the proposed Project and does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR.

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From: Remedies Santos <meds004@hotmail.com>
Sent: Wednesday, March 1, 2023 8:54 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Remedios Santos
1247 Voltaire Drive
Riverside Ca 92506
meds004@hotmail.com

Sent from my iPhone

Letter I-426

Remedios Santos
March 1, 2023

I-426.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Rosenberg Alfaro <rosenberg.alfaro@gmail.com>
Sent: Wednesday, March 1, 2023 4:28 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Rosenberg Alfaro
1(951)453-9678

Letter I-427

Rosenberg Alfaro
March 1, 2023

I-427.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Senanu Pearson <senanu.pearson@gmail.com>
Sent: Wednesday, March 1, 2023 4:13 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

Having studied the effects of land use on the expected survival of a local species (Stephens' Kangaroo Rat), I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Senanu Spring-Pearson
6195 Oswego Dr.
Riverside, CA 92506
Senanu.pearson@gmail.com

Letter I-428

Senanu Spring-Pearson
March 1, 2023

I-428.1 This comment letter is a variation of Form Letter C – Biological Resources with an addition to the second paragraph expressing concerns about the shrinking of open space and destruction of habitat, and the effects of land use on the expected survival of a local species. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), Stephens' Kangaroo Rat is presumed present on the project site. As discussed in Section 4.3, Biological Resources, of the Draft EIR, project impacts on this species were addressed as part of the March Air Force Base closure USFWS Section 7 consultation (BO 1-6-99-F-13) and CBD Settlement Agreement (S.D. Cal. No. 09-cv-1854-JAH-POR). Pursuant to those agreements, 664 acres of lands were placed into conservation easement to offset potential species habitat losses due to development of project site and other 'developable lands'. Additionally, the CDFW reviewed the USFWS BO decision and issued a consistency determination (2080-1999-056-6) stating that "Biological Opinion No. 1- 6-99-F-13 is consistent with the California Endangered Species Act (CESA) as to anticipated take of the least Bell's vireo and Stephens' kangaroo rat" (CDFW 1999). Additionally, the USFWS and CDFW confirmed in 2006 that the areas taken out of the "Stephens' kangaroo rat management area" were no longer part of the core reserve and incidental take was authorized within these areas pursuant to the HCP (USFWS/CDFG WRIV-3259.5). The existing Conservation Easement will be expanded to include the Upper Plateau Conservation area acreage. Funding will be established by the Developer upon the expansion of the existing Conservation Easement. Thus, incidental take of Stephens' kangaroo rat on the project site is permitted and potential Project direct impacts to Stephens' kangaroo rat are less than significant. With implementation of MM-BIO-1 (Best Management Practices) and MM-BIO-4 (Stephens' Kangaroo Rat Avoidance and Mitigation), Project construction-related indirect impacts to Stephen's kangaroo rat would be less than significant. With implementation of MM-BIO-3 (Operation-Related Indirect Impacts to Special-Status Wildlife), operation-related indirect impacts to Stephen's kangaroo rat would be less than significant. All other text within the letter remains the same as Form Letter C. As such, in response to this comment, please see Form Letter C Response.

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From: Senanu Pearson <senanu.pearson@gmail.com>
Sent: Wednesday, March 1, 2023 4:15 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Senanu Spring-Pearson
6195 Oswego Dr.
Riverside, CA 92506
Senanu.pearson@gmail.com

Letter I-429

Senanu Spring-Pearson
March 1, 2023

I-429.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Senanu Pearson <senanu.pearson@gmail.com>
Sent: Wednesday, March 1, 2023 4:15 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Senanu Spring-Pearson
6195 Oswego Dr.
Riverside, CA 92506
Senanu.pearson@gmail.com

Letter I-430

Senanu Spring-Pearson
March 1, 2023

I-430.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Senanu Pearson <senanu.pearson@gmail.com>
Sent: Wednesday, March 1, 2023 4:15 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Senanu Spring-Pearson
6195 Oswego Dr.
Riverside, CA 92506
Senanu.pearson@gmail.com

Letter I-431

Senanu Spring-Pearson
March 1, 2023

I-431.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Senanu Pearson <senanu.pearson@gmail.com>
Sent: Wednesday, March 1, 2023 4:16 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Senanu Spring-Pearson
6195 Oswego Dr.
Riverside, CA 92506
Senanu.pearson@gmail.com

Letter I-432

Senanu Spring-Pearson
March 1, 2023

I-432.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Senanu Pearson <senanu.pearson@gmail.com>
Sent: Wednesday, March 1, 2023 4:16 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Senanu Spring-Pearson
6195 Oswego Dr.
Riverside, CA 92506
Senanu.pearson@gmail.com

Letter I-433

Senanu Spring-Pearson
March 1, 2023

I-433.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Senanu Pearson <senanu.pearson@gmail.com>
Sent: Wednesday, March 1, 2023 4:16 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,9agV82jGtjFgG2hobrpvFASPGYyzi2cvHhur47P44_9XpgJNlNgAN7_i8kvdc1KziR9XO_L8CLa0sgLvgxKO7-m_B8rdr4RtSE2QhTmmU55GfEjXuWpRNw,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,gUxnbBHUQlAO3iBkNHhts99KScqx0MMAxcKScs4-yQ_giL4YVfz55HThNzEjL3DK_gQuPjJH0MVa6c_WEZfCvcTuipyBF4tDrRDNwiDfuoESsYMJ&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Senanu Spring-Pearson
6195 Oswego Dr.
Riverside, CA 92506
Senanu.pearson@gmail.com

Letter I-434

Senanu Spring-Pearson
March 1, 2023

I-434.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Carlos LLiguin <malinalli_1997@yahoo.com>
Sent: Thursday, March 2, 2023 8:49 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,H2mGaN1IZs5zfjFyTX6bSyNHKof9CVzAwRbZXgGWZouJv2_R3kIHZVEHiAs8mo7ON1ErXtC5HJuU6gOzWMTGhbUrO2DHB_ODeJKT293UXx6GLGC4-0gqQ20Fbw81&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone

(https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,jPsVSTDOQC6LyqsAzJiSXf_Wh0f4wOpfEHA_3q0wPsTi7XJMaVoaL2bD-gePYeNd_ao8qbMLCQ34C_-Ee9feOTPSRbGr80VoS_7EW4aT39-J&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

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Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

<include name, address, email in signature line>

Sent from my iPhone

Letter I-435

Carlos Lliguin
March 1, 2023

I-435.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Carlos LLiguin <malinalli_1997@yahoo.com>
Sent: Thursday, March 2, 2023 8:51 PM
To: Dan Fairbanks
Cc: Carlos LLiguin
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,6kmz9tq3jJnMu_hh783xQijvg16CNi8rVABRvlvgEryBWlla7BfV42WZFun3jy9QQbR8en3EcqnTsZsNdjT2gPep1xIe2mxd6kHzA_BY2Tv4OA,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone

(https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,w69z6FB-dkHwRHBa2EqkQzqG8ZaocPLSModHbL4BLvFiqUkGW78fHCMN2Hs0JS2vKelIqY_UJ1pMoiB_yeEzO3hXJfsAso_JvHJ0NLb1iA,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Carlos Lliguin
20871 Amaryllis Way
Riverside, CA 92508
Malinalli_1997@yahoo.com

Letter I-436

Carlos Lliguin
March 1, 2023

I-436.1 This comment letter is a duplicate of Letter I-435 and is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

INTENTIONALLY LEFT BLANK

From: Carlos LLiguin <malinalli_1997@yahoo.com>
Sent: Thursday, March 2, 2023 8:53 PM
To: Dan Fairbanks
Cc: Carlos LLiguin
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing

warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Carlos Lliguin
20871 Amaryllis Way
Riverside, CA 92508
Malinalli_1997@yahoo.com

Letter I-437

Carlos Lliguin
March 1, 2023

I-437.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Carlos LLiguin <malinalli_1997@yahoo.com>
Sent: Thursday, March 2, 2023 8:53 PM
To: Dan Fairbanks
Cc: Carlos LLiguin
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Carlos Lliguin
20871 Amaryllis Way
Riverside, CA 92508
Malinalli_1997@yahoo.com

Letter I-438

Carlos Lliguin
March 1, 2023

I-438.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

INTENTIONALLY LEFT BLANK

From: Carlos LLiguin <malinalli_1997@yahoo.com>
Sent: Thursday, March 2, 2023 8:54 PM
To: Dan Fairbanks
Cc: Carlos LLiguin
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Carlos Lliguin
20871 Amaryllis Way
Riverside, CA 92508
Malinalli_1997@yahoo.com

Letter I-439

Carlos Lliguin
March 1, 2023

I-439.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

INTENTIONALLY LEFT BLANK

From: Carolyn Rasmussen <crasmu@ucr.edu>
Sent: Thursday, March 2, 2023 8:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: IMG_2533.jpeg; IMG_1960.jpeg; IMG_2120.jpeg; IMG_2166.jpeg; IMG_2124.jpeg; IMG_2099.jpeg; IMG_2528.jpeg; IMG_2240.jpeg; IMG_2355.jpeg; IMG_2214.jpeg

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would generate over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

I-440.1

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

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

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing

warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

I-440.1 Cont.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

To show you just how often trucks travel on Alessandro Blvd already (past the "nothing over 4 axles" sign), I attach here some photographs of the trucks on this route taken on the 7:30 commute since September 2022. We already have a problem with trucks traveling on our roads, and your proposed traffic enforcement measures are insufficient. Without real traffic calming measures that are enforced by the police, this problem will get even worse.

I-440.2

Sincerely,
Carolyn Rasmussen
19597 Denair Court, Riverside, CA 92508
cgrasmus@yahoo.com


Jeep


218050
McLANE
WARNING
"LIGHTS ON"
FOR SAFETY
218050
CAUTION




38
OFF
No entries
are available.
54


9G61643


40 Years GOLF


PacificSeafood
Providing the
healthiest protein on the planet.
1-800-388-1101
www.pacificseafood.com


P O S A L
Management Services
MEDI-WASTE.COM





Letter I-440

Carolyn Rasmussen
March 2, 2023

I-440.1 This comment is Form Letter G – Traffic with one non-substantive text modification in the introductory paragraph: "site" is replaced with "generate." This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, in response to this comment, please see Form Letter G Response.

I-440.2 This comment raises concerns regarding truck route enforcement and includes ten photos purporting to show trucks violating the "nothing over 4 axels" sign posted on Alessandro Boulevard. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway.

Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. (Appendix N-3)

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From: Chyee Wang <cqwang63@gmail.com>
Sent: Thursday, March 2, 2023 8:31 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
<include name, address, email in signature line>

Letter I-441

Chyee Wang
March 2, 2023

I-441.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Chyee Wang <cqwang63@gmail.com>
Sent: Thursday, March 2, 2023 8:30 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

<include name, address, email in signature line>

Letter I-442

Chyee Wang
March 2, 2023

I-442.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Ginette Lillibridge <kgbridge@sbcglobal.net>
Sent: Thursday, March 2, 2023 12:48 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Letter I-443

Ginette Lillibridge
March 2, 2023

I-443.1 This comment letter is a truncated version Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Ginette Lillibridge <kgbridge@sbcglobal.net>
Sent: Thursday, March 2, 2023 12:49 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Wildlife: 1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Letter I-444

Ginette Lillibridge
March 2, 2023

I-444.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Kristin Fyfe <krijen15@hotmail.com>
Sent: Thursday, March 2, 2023 12:58 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

<include name, address, email in signature line>

Sent from my iPhone

Letter I-445

Kristin Fyfe
March 2, 2023

I-445.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Kristin Fyfe <krijen15@hotmail.com>
Sent: Thursday, March 2, 2023 12:58 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
<include name, address, email in signature line>

Sent from my iPhone

Letter I-446

Kristin Fyfe
March 2, 2023

I-446.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Kristin Fyfe <krijen15@hotmail.com>
Sent: Thursday, March 2, 2023 12:58 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,i7MqvrrAKoDnN3aDueRY4WWPTvpk_XB9EbNxtsnDS52dgCj6hZhdlWDTrBaDG2vW8-YFNvoRw_3yeR02t57LDYMW9eCIzxNzRtkwZOFVqsitWHCCNUL5ms0,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone

(https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,fGXUPzOBhxT1RnKUSu1UprGhXNZq7ppfPekgwER9mBUl9SETVj0O-MSxHP3_2Yyr4F58GNqMLFbABAktH6eI3VrHwHVUxVl20ejcGlFoNwbT3FBfdCKCutfaGQ,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

<include name, address, email in signature line>

Sent from my iPhone

Letter I-447

Kristin Fyfe
March 2, 2023

I-447.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Kristin Fyfe <krijen15@hotmail.com>
Sent: Thursday, March 2, 2023 12:58 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

<include name, address, email in signature line>

Sent from my iPhone

Letter I-448

Kristin Fyfe
March 2, 2023

I-448.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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Letter I-449

[NOT USED]

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From: Kristin Fyfe <krijen15@hotmail.com>
Sent: Thursday, March 2, 2023 12:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Kristin Fyfe
8262 yarrow lane. Riverside

krijen15@hotmail.com

Sent from my iPhone

Letter I-450

Kristin Fyfe
March 2, 2023

I-450.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Kristin Fyfe <krijen15@hotmail.com>
Sent: Thursday, March 2, 2023 1:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Kristin Fyfe
8262 Yarrow Lane Riverside
krijen15@hotmail.com

Sent from my iPhone

Letter I-451

Kristin Fyfe
March 2, 2023

I-451.1 This comment letter is a duplicate of Letter I-448 and is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Thursday, March 2, 2023 7:34 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,_x9uh4HUa2PhvHtE4FMMmYAIaw4OsH-KRj69YsT4z2w-XCfUGdkVPPNi_Cd0t7F9HRIxsWKY9gdD9o-1sD-hXt9p2NilM5EYSFRy_HDpdm3FONumhEI5AY0,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,ZJhXOz3fwqq2BhG9s-JTrPL1nbaI4fWhv5ESOY9lspGuF-q21J0OWCIaabN0rfZeUkXelvWzBrT9dxeLs3fZNw-5b4ZtQpwKWKZ9qo9Tsu24M8Hn&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Peter Pettis
14505 Crystal View Terrace
Riverside, CA 92508
pettis.peter@gmail.com

Letter I-452

Peter Pettis
March 2, 2023

I-452.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Thursday, March 2, 2023 7:34 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Peter Pettis
14505 Crystal View Terrace
Riverside, CA 92508
pettis.peter@gmail.com

Letter I-453

Peter Pettis
March 2, 2023

I-453.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Thursday, March 2, 2023 7:35 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Peter Pettis
14505 Crystal View Terrace
Riverside, CA 92508
pettis.peter@gmail.com

Letter I-454

Peter Pettis
March 2, 2023

I-454.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Thursday, March 2, 2023 7:35 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Peter Pettis
14505 Crystal View Terrace
Riverside, CA 92508
pettis.peter@gmail.com

Letter I-455

Peter Pettis
March 2, 2023

I-455.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Thursday, March 2, 2023 7:35 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Peter Pettis
14505 Crystal View Terrace
Riverside, CA 92508
pettis.peter@gmail.com

Letter I-456

Peter Pettis
March 2, 2023

I-456.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Thursday, March 2, 2023 7:35 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Peter Pettis
14505 Crystal View Terrace

Riverside, CA 92508
pettis.peter@gmail.com

Letter I-457

Peter Pettis
March 2, 2023

I-457.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Thursday, March 2, 2023 7:35 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Peter Pettis
14505 Crystal View Terrace
Riverside, CA 92508
pettis.peter@gmail.com

Letter I-458

Peter Pettis
March 2, 2023

I-458.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Sue Nipper <markel221@gmail.com>
Sent: Thursday, March 2, 2023 4:16 PM
To: Dan Fairbanks
Subject: Draft EIR Comment Letter for the Proposed West Campus Upper Plateau
Attachments: EIR Response Lettter - Long-Term Ownership and Maintenance.pdf

Dear Mr. Fairbanks,

Attached you will find my comment letter on the Draft EIR for the proposed West Campus Upper Plateau. Thank you for the opportunity to comment. I look forward to receiving a response from you soon.

Sincerely,

Susan Nipper
Longtime Orangecrest Homeowner
Member of R-Now (Riverside Neighbors Opposing Warehouses)

19367 Mt Wasatch Dr
Riverside, CA 92508
(909) 238-7669
markel221@gmail.com

March 2, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report

Dear Mr. Fairbanks:

As a concerned, longtime resident of Orangecrest and a member of R-Now (Riverside Neighbors Opposing Warehouses), I am writing to submit comments on the draft Environmental Impact Report for the proposed West Campus Upper Plateau.

I have serious concerns regarding the proposed project's long-term ownership and maintenance. This proposed project is in an area outside the City of Riverside.

Nowhere in the March JPA West Campus Upper Plateau Draft Environmental Impact Report (DEIR) is long-term ownership and maintenance of the completed project discussed. There will be roads to be maintained, landscaping, park and playgrounds, parking lots, etc. The City of Riverside has not claimed this property.

My concerns are as follows:

- **Who will inherit this land when the March JPA sunsets?**
- **If this has not yet been determined, who will be responsible for holding the developer accountable for mitigation measures? How will the March JPA ensure that there is follow-through for agreed-upon terms in the EIR?**
- **Who will be in charge of enforcement if the occupants violate agreed-upon terms of the EIR (traffic flow, operating hours, etc.)? What will the enforcement mechanism be?**

I-459.1

Without established terms and accountability for maintenance and enforcement, the public is concerned that there simply won't be any.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,

Susan Nipper
Longtime Orangecrest Homeowner
Member of R-Now (Riverside Neighbors Opposing Warehouses)

Susan Nipper
19367 Mt Wasatch Dr
Riverside, CA 92508
909-238-7669
markel221@gmail.com

Letter I-459

Susan Nipper
March 2, 2023

I-459.1 This comment questions who will take over the Project site once March JPA sunsets, and who will be responsible for mitigation implementation and enforcement. In response to this comment, please see Topical Response 9 – Long-Term Project Implementation and Enforcement, regarding the County of Riverside's responsibility for Project implementation and enforcement of conditions and mitigation measures. Additionally, although not a CEQA issue, following the reversion of March JPA's land use authority, road, landscaping, park and playground maintenance will be managed and undertaken in a manner consistent with the responsibilities outlined in Table 7-1. Maintenance Responsibilities, of the proposed Specific Plan.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Friday, March 3, 2023 4:44 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and demand that the project applicant be required to make every effort to preserve endangered and threatened wildlife and plant-life in the area.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? The final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant-life

1. Why is the coastal scrub documented in some parts of the DEIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant-life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why was the plant survey conducted during a drought year? How can the DEIR claim it is absent or assess the significance of impact unless its absence has been documented during a year and season of normal rainfall, when the rare plant life would be able to grow?

Given these deficiencies, I demand that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also demand that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that the project will not be destroying rare plant life unless a more thorough survey is conducted.

Finally, I demand that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can the public be assured that these mitigation measures will be enforced?

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-460

Aaron Bushong
March 3, 2023

I-460.1 This comment letter is a modified version of Form Letter C – Biological Resources. The text edits are not substantive and do not raise any new or different issues that what are raised within Form Letter C. As such, in response to this comment, please see Form Letter C Response.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Friday, March 3, 2023 4:46 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section are highly disconcerting. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than diesel particulate matter will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous military use of the project construction area.

Please specifically address the following items:

1. How did you determine which chemicals to test for and which to omit? Why was diesel particulate matter the only substance considered in the "Human Risk Assessment" section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the weapons bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long timeframe since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I demand that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any others that may have been stored in the weapons bunkers. I also demand that you share with the public all information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil will be treated, given its high concentration.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health, and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I demand that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issuance of demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, those materials must be completely removed.

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-461

Aaron Bushong
March 3, 2023

I-461.1 This comment letter is a modified version of Form Letter D – Hazards. The text edits are not substantive and do not raise any new or different issues that what are raised within Form Letter D. As such, in response to this comment, please see Form Letter D Response.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Friday, March 3, 2023 4:46 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am appalled that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses, as long as they are low-density. Please specify what other land uses C-2 zoning allows and why they are not being pursued.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on three sides by residential homes, and that residents have submitted over 2,500 signatures, hundreds of emails, and scores of comments at public meetings opposing the project, how is that feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how can the utter disregard for the community opposition in relation to the reuse plan policies be justified?

In the General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions**"** and **"**Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air-quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways has Community Preference been incorporated in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for

"Industrial/Warehousing" uses and it explicitly shows "Industrial/Warehousing" land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as a Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 states,

> The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space. When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to "up zone" the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, the March JPA is obligated to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-462

Aaron Bushong
March 3, 2023

I-462.1 This comment letter is a modified version of Form Letter E – Project Consistency. The text edits are not substantive and do not raise any new or different issues that what are raised within Form Letter E. As such, in response to this comment, please see Form Letter E Response.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Friday, March 3, 2023 4:47 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The traffic section of the document presents serious concerns. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project, and the project's own traffic estimates indicate that approximately 20,000 additional trips will use the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in the analysis, especially when considering that the traffic analysis fails to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. The traffic sections also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How can the analysis justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did the analysis exclude known construction projects that have already been permitted to be built?

I demand the traffic section be updated to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable.

How traffic will affect our arterial streets is another major concern. The analysis assumes drivers will use approved paths, but it is clear from experience this is not the case. For instance, on February 2, a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety.

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

I demand that the traffic study be updated to reflect the actual conditions of the surrounding area.

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-463

Aaron Bushong
March 3, 2023

I-463.1 This comment letter is a modified version of Form Letter G – Traffic. The text edits are not substantive and do not raise any new or different issues that what are raised within Form Letter G. As such, in response to this comment, please see Form Letter G Response.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Friday, March 3, 2023 4:48 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air-quality impacts on surrounding residents. However, beyond that admission, there are numerous deficiencies in the analysis, and it underestimates the air-quality impacts.

The analysis does not consider the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. I demand that these impacts be included in both the local and regional analysis for the final EIR. The analysis also fails to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. The air-quality and health-risk assessment must be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, the project applicant must apply the conservative AQMD Rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, it is important to be more conservative in truck trip rate projections. Using the Rule 2305 numbers would almost double the daily truck trips.

Also, the March JPA has a responsibility to mitigate significant impacts on the surrounding community. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Why were such mitigations not considered in the DEIR for this site?

Significant mitigations must be put in place to reduce the impact on local residents:

1) Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2) Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

The impact on air quality must also be mitigated by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least that can be done to protect the surrounding community. California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning. A minimum of 50% of delivery

vehicles must be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. 30% of trucks must also be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I demand that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will the March JPA assure adjacent residents that their interests will be protected?

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-464

Aaron Bushong
March 3, 2023

I-464.1 This comment letter is a modified version Form Letter B – Air Quality. The text edits are not substantive and do not raise any new or different issues that what are raised within Form Letter B. As such, in response to this comment, please see Form Letter B Response.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Friday, March 3, 2023 4:49 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How was that number calculated? On what evidence was it based? There is no analysis in the DEIR to justify the number of jobs. Please provide a detailed, evidence-based analysis justifying the number of jobs.

The Greenhouse Gas (GHG) section claims that the development will have a net positive effect because local community members will have less of a commute driving to work. No one with a temporary, part-time, and/or low-paying warehouse job will be able to afford to live anywhere within the surrounding community? On what data was the assumption that local residents need or desire low-paying warehouse jobs based? What data was used to calculate the vehicle miles travelled? How were the traffic models that assume 21-mile commutes would be shortened to 16-mile commutes created? Please justify the assertions by providing data detailing the mean, median, and mode monthly salary of the jobs that will be created and the mean, median, and mode monthly rent/mortgage in the surrounding communities. It is clear that the job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region far exceeds the number of available employees in the region. The current unemployment rate is at a 50-year low, and there are over 4,000 acres of approved and planned warehouses along the 215/60 corridor. At 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318,000 in Riverside, 212,000 in Moreno Valley, 80,000 in Perris, and 20,000 in Mead Valley). There are about 300,000 people in the labor force (For those aged 16+, the labor force participation rate is 62%.). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work in warehouses. Assuming that 50% can work in warehouses, that still leaves well over 20,000 jobs to be filled. The population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support any additional warehouse jobs. The only way to fill those jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This

demonstrates that the vehicle miles travelled per employee estimates indicating shorter commutes are incorrect. This project will further exacerbate housing stress by requiring workers to commute from well outside of a 15-mile radius of the project. Even if allowed for the faulty assumption that locals would commute to the site, how would the analysis change if one accounts for automation in warehouses, or the fact that Californians are required to purchase electric vehicles by 2035? Please justify the current vehicle miles travelled per employee estimates using actual job, population, and housing estimates from the last three months, rather than seven-year-old SCAG projections that are completely incorrect.

It is obvious that the region does not have the capacity to staff these warehouses locally. Please consider more appropriate alternatives for the project, such as single-family residential homes that would actually serve to improve the real-world jobs-to-housing imbalance. Housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-465

Aaron Bushong
March 3, 2023

I-465.1 This comment letter is a modified version of Form Letter F – Jobs. The text edits are not substantive and do not raise any new or different issues that what are raised within Form Letter F. As such, in response to this comment, please see Form Letter F Response.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Friday, March 3, 2023 4:49 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-466.1

The project site comprises approximately 817.9 acres within the western portion of the March JPA planning sub-area (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and the City of Moreno Valley.

The zoning designation in the DEIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities, but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have, including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant?" Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. The March JPA must demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here. Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-466.2

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view

image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? Furthermore, the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. The Aesthetics section must be revised, so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Images that reflect the actual appearance of warehouses in the area must also be used. Otherwise, the images and the Aesthetics section are a lie and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond the visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which have been identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of Western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. The March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large, industrial, mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal, low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan, and the community demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. They also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered, and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Do not allow one final, grand act of poor land use planning to be the lasting legacy of the March JPA.

I-466.2 Cont.

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-466

Aaron Bushong
March 3, 2023

I-466.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 SF of warehouse use, 528,951 SF of office use, and 160,921 SF of retail use. The comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

I-466.2 This comment is a modified version of Form Letter A – Aesthetics. The text edits are not substantive and do not raise any new or different issues that what are raised within Form Letter A. As such, in response to this comment, please see Form Letter A Response.

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Comment Letter I-467

From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Saturday, March 4, 2023 3:47 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I have lived in the same house in the Orangecrest neighborhood for 23 years. During that time, I have joined my neighbors in attempting to work with the March Joint Powers Authority on responsible planning for the 4,400 acres of surplus property. My neighbors and I worked to oppose the DHL cargo facility in the early aughts. We were ignored, and DHL failed within four years. My neighbors and I have worked over the past 15 years to oppose the development along Meridian Parkway and Van Buren Boulevard. We have been ignored, and one merely needs to drive those roads to see the numerous unoccupied, nondescript, and/or anemic buildings, many of which have remained vacant since they were built. I-467.1

The March Joint Powers Authority has demonstrated its poor planning, lack of foresight, and utter disregard for Riverside residents' well-being and safety for at least the past 23 years. The West Campus Upper Plateau Project is only the most recent misguided and uninformed project that, similar to past projects, will be detrimental to the quality of life for local residents. I-467.2

Riverside consistently ranks near the top of any list of cities in California in terms of pollution and traffic congestion. The West Campus Upper Plateau Project will only exacerbate the pollution and traffic congestion in Riverside. I demand that the developer revise the entire project to include non-industrial alternatives, has been consistently requested by the community for over a year. I-467.3

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-467

Aaron Bushong
March 4, 2023

I-467.1 This comment expresses opposition to industrial projects in the Mach JPA Planning Area but does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR.

I-467.2 This comment expresses opposition to the Project. The comment does not raise specific concerns regarding the adequacy of the environmental analysis in the Draft EIR.

I-467.3 This comment expresses general concern regarding pollution and traffic congestion and requests the consideration of non-industrial alternatives. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. Please see Topical Response 8 –Alternatives, for the environmental analysis of Alternative 5 – Non-Industrial Alternative.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Saturday, March 4, 2023 3:55 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I have lived in the Orangecrest neighborhood since March of 2000. Over the past 23 years, I have experienced the same deception and lies from the March JPA as are presented in the draft environmental impact report: lies about jobs that don't pay enough for employees to even live in the City of Riverside and that, with automation, will soon be obsolete; lies about parks, trails, and open spaces that never come to fruition; and lies about construction, an abundance of which is currently vacant and has never been occupied. Those lies have systematically transformed one of the most desirable and attractive residential neighborhoods in the City of Riverside into a sea of unsightly office buildings and warehouses that are inconsistent with responsible city planning. The March JPA is using the same tactics to promote the West Campus Upper Plateau Project. I-468.1

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in that document. They also have a duty to work with local communities to develop the West Campus Upper Plateau in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project must be reconsidered, and reasonable alternative configurations must be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. I-468.2 I-468.3

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-468

Aaron Bushong
March 4, 2023

I-468.1 This comment expresses general opposition to the Project and does not raise any specific issues, questions or concerns about the analysis in the Draft EIR. Regarding automation, while existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete.

I-468.2 This comment states that March JPA and the Applicant have a duty to adhere to the March ARB General Plan and engage the local communities and municipalities. It should be noted that the March Air Reserve Base does not have an adopted General Plan. The Project's consistency with the March JPA General Plan goals and policies is included in Recirculated Section 4.10, Land Use and Planning. March JPA and the Applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation. Using a radius of 1,200 feet around the perimeter of the Project site, March JPA distributed 2,172 public notices. March JPA engaged with local jurisdictions and service providers (see, e.g., the traffic scoping agreement in Appendix N-2).

I-468.3 This comment requests consideration of alternatives to reduce aesthetic impacts. CEQA Guidelines Section 15126.6(f) provides that "[t]he range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project." As examined in Section 4.1, Aesthetics, of the Draft EIR and Topical Response 1 - Aesthetics, the EIR has disclosed the Project's aesthetic impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be less than significant with implementation of PDF-AES-1 through PDF-AES-16 and MM-AES-1 through MM-AES-3. As such, the reduction of aesthetic impacts would not be a required priority in the selection of a reasonable range of alternatives to the Project. The alternatives presented in Chapter 6, Alternatives, of the Draft EIR, have all been evaluated for potential aesthetic impacts. Similar to the analysis included in Section 4.1, Aesthetics, consideration of visual changes to publicly available views of the Project site were considered. Alternative 2 (Reduced Development) and Alternative 4 (Reduced Cultural Resource Impact) were determined to have reduced aesthetics impacts compared to the Project. Topical Response 8 – Alternatives, presents and analyzes Alternative 5 – Non-Industrial Alternative, determining its aesthetic impacts would be similar to the Project's.

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From: Annabelle Porter <belleporter@gmail.com>
Sent: Friday, March 3, 2023 3:32 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would be over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Annabelle Porter
20856 Oakdale Lane
Riverside, CA 92508
belleporter@gmail.com

Letter I-469

Annabelle Porter
March 3, 2023

I-469.1 This comment letter is Form Letter F – Jobs, with a non-substantive text edit in the first paragraph ("site" is replaced with "be"). As such, in response to this comment, please see Form Letter F Response.

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From: Annabelle Porter <belleporter@gmail.com>
Sent: Friday, March 3, 2023 3:32 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Annabelle Porter
20856 Oakdale Lane
Riverside, CA 92508
belleporter@gmail.com

Letter I-470

Annabelle Porter
March 3, 2023

I-470.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Annabelle Porter <belleporter@gmail.com>
Sent: Friday, March 3, 2023 3:33 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Annabelle Porter
20856 Oakdale Lane
Riverside, CA 92508
belleporter@gmail.com

Letter I-471

Annabelle Porter
March 3, 2023

I-471.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Annabelle Porter <belleporter@gmail.com>
Sent: Friday, March 3, 2023 3:33 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Annabelle Porter
20856 Oakdale Lane
Riverside, CA 92508
belleporter@gmail.com

Letter I-472

Annabelle Porter
March 3, 2023

I-472.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Annabelle Porter <belleporter@gmail.com>
Sent: Friday, March 3, 2023 3:33 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Annabelle Porter
20856 Oakdale Lane
Riverside, CA 92508
belleporter@gmail.com

Letter I-473

Annabelle Porter
March 3, 2023

I-473.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Annabelle Porter <belleporter@gmail.com>
Sent: Friday, March 3, 2023 3:33 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Annabelle Porter
20856 Oakdale Lane

Riverside, CA 92508
belleporter@gmail.com

Letter I-474

Annabelle Porter
March 3, 2023

I-474.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Annabelle Porter <belleporter@gmail.com>
Sent: Friday, March 3, 2023 3:34 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Annabelle Porter
20856 Oakdale Lane
Riverside, CA 92508
belleporter@gmail.com

Letter I-475

Annabelle Porter
March 3, 2023

I-475.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Ofelia Bobadilla <ofboba@gmail.com>
Sent: Friday, March 3, 2023 9:19 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect beca

Sent from my iPhone

Letter I-476

Ofelia Bobadilla
March 3, 2023

I-476.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Chris Shearer <nonnax3@yahoo.com>
Sent: Saturday, March 4, 2023 1:56 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

I-477.1

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

I also have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:

1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchlorothylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

I-477.2

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. **Why did each of the alternative plans include 143 acres of industrial zoning?** The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. **Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.**

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; **how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?**

I-477.3

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions**"** and **"**Protect the interest of, and existing

commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." **How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.**

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). **In what specific ways have you incorporated Community Preference in the development of your plan?**

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

> "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
> b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
> d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-477.3 Cont.

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

I-477.4

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

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

I-477.4 Cont.

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

I-477.5

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric

vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I-477.5 Cont.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

I-477.6

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.
The methods used in the, development of Calif. have instead deteriorated the standard of living calif residents once shared. Warehouses, not only add to congestion, but pollution as well. We need to maximize the properties that already exist!

I-477.6 Cont.

I-477.7

Thank you for allowing me to provide comments on this project.

Sincerely,

Chris Shearer
Riverside, CA 92507
nonnax3@yahoo.com

Letter I-477

Chris Shearer
March 4, 2023

I-477.1 This comment is the same as Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

I-477.2 This comment is the same as Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

I-477.3 This comment is the same as Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-477.4 This comment is the same as Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-477.5 This comment is the same as Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-477.6 This comment is the same as Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

I-477.7 This comment expresses general opposition and does not raise any specific issues, questions or concerns about the environmental analysis in the Draft EIR. As such, no further response is provided.

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From: Chris Shearer <nonnax3@yahoo.com>
Sent: Saturday, March 4, 2023 1:59 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents. The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response. Sincerely,

Chris Shearer

Letter I-478

Chris Shearer
March 4, 2023

I-478.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Constance King <connielk@verizon.net>
Sent: Saturday, March 4, 2023 7:10 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Wildlife: 1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w

Letter I-479

Constance King
March 4, 2023

I-479.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Don Morris <drdmorris@earthlink.net>
Sent: Saturday, March 4, 2023 6:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect. Please send information why this will be true.

Don Morris

7177 Brockton Ave. #331
Riverside, CA. 92506

Letter I-480

Don Morris
March 4, 2023

I-480.1 This comment letter is a truncated version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Don Morris <drdmorris@earthlink.net>
Sent: Saturday, March 4, 2023 7:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000%2

Don Morris

7177 Brockton Ave. #331
Riverside, CA. 92506

Letter I-481

Don Morris
March 4, 2023

I-481.1 This comment letter is a truncated version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Don Morris <drdmorris@earthlink.net>
Sent: Saturday, March 4, 2023 7:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in the area.

Don Morris

7177 Brockton Ave. #331
Riverside, CA. 92506

Letter I-482

Don Morris
March 4, 2023

I-482.1 This comment letter is a truncated version of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Don Morris <drdmorris@earthlink.net>
Sent: Saturday, March 4, 2023 7:01 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area.

Don Morris

7177 Brockton Ave. #331
Riverside, CA. 92506

Letter I-483

Don Morris
March 4, 2023

I-483.1 This comment letter is a truncated version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Don Morris <drdmorris@earthlink.net>
Sent: Saturday, March 4, 2023 7:02 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive studies to accurately test the pollution.

Don Morris

7177 Brockton Ave. #331
Riverside, CA. 92506

Letter I-484

Don Morris
March 4, 2023

I-484.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Don Morris <drdmorris@earthlink.net>
Sent: Saturday, March 4, 2023 7:03 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive studies.

Don Morris

7177 Brockton Ave. #331
Riverside, CA. 92506

Letter I-485

Don Morris
March 4, 2023

I-485.1 This comment letter is a truncated version of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Don Morris <drdmorris@earthlink.net>
Sent: Saturday, March 4, 2023 7:04 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database.

Don Morris

7177 Brockton Ave. #331
Riverside, CA. 92506

Letter I-486

Don Morris
March 4, 2023

I-486.1 This comment letter is a truncated version of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Don Morris <drdmorris@earthlink.net>
Sent: Saturday, March 4, 2023 7:08 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. How will that level be met?

Don Morris

7177 Brockton Ave. #331
Riverside, CA. 92506

Letter I-487

Don Morris
March 4, 2023

I-487.1 This comment letter is a truncated version of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Leo Bobadilla <leoboba7@gmail.com>
Sent: Saturday, March 4, 2023 5:16 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,nOfeFTIXOfHSWS5a2WKr80J3J5KBJgX79UCmXJX9JGuOAU_Y0WBs5PIVQF3DUtscTqEzSvE2XBrFXIbsOv2Q5-YCubQp8RnD42mlxGHbXhWOKbkIrMI,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,hD3nKQjtzs50Wk1quJzXi7WTQpGiiNOs--_-3qBEe11pA7mpMP_w9oYF6MibPbv4unL5IJyaaz_wL7ZwfvbCP8FgrzmXHA0W7PGHvKQXzD7kzYI,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

<include name, address, email in signature line>

Sent from my iPhone

Letter I-488

Leo Bobadilla
March 4, 2023

I-488.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Lynn Larsen <twins4larsen@gmail.com>
Sent: Saturday, March 4, 2023 3:37 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

We have serious concerns about the shrinking of open spaces and destruction of habitat, and we ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. I-489.1

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, we request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. We also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

We also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced? I-489.1 Cont.

Living on the edge of the area that will be preserved in the project, we can confirm that it is used daily by bikers, hikers, and those walking their dogs. It is an important green space that should not be bordered by ugly warehouses and idling trucks spewing pollution into our environment. I-489.2

Thank you for allowing us to provide comments on this project.

Sincerely,
Lynn and Paul Larsen
20304 Dayton St., Riverside, CA, 92508

Letter I-489

Lynn & Paul Larsen
March 4, 2023

I-489.1 This comment is Form Letter C – Biological Resources with non-substantive text edits ("I" replaced with "we"). As such, in response to this comment, please see Form Letter C Response.

I-489.2 This comment expresses concern regarding the Project's aesthetics and air quality impacts to the Conservation Easement and its recreational users. As explained in Section 4.1, Aesthetics, and Topical Response 1 - Aesthetics, the EIR has disclosed the Project's aesthetic impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be less than significant with implementation of PDF-AES-1 through PDF-AES-16 and MM-AES-1 through MM-AES-3. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Specifically, Recirculated Section 4.2, Air Quality, has further evaluated and disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The comment does not raise specific issues, questions or concerns about the environmental analysis in the Draft EIR and as such, no further response is provided.

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From: Amy Litt <amy.litt@ucr.edu>
Sent: Sunday, March 5, 2023 4:06 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Amy Litt
1250 San Cristobal Drive
Riverside, CA 92506

Letter I-490

Amy Litt
March 5, 2023

I-490.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Amy Litt <amy.litt@ucr.edu>
Sent: Sunday, March 5, 2023 4:07 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Amy Litt
1250 San Cristobal Drive
Riverside, CA 92506
amy.litt@ucr.edu

Letter I-491

Amy Litt
March 5, 2023

I-491.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Amy Litt <amy.litt@ucr.edu>
Sent: Sunday, March 5, 2023 4:07 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Amy Litt
1250 San Cristobal Drive
Riverside, CA 92506
amy.litt@ucr.edu

Letter I-492

Amy Litt
March 5, 2023

I-492.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Amy Litt <amy.litt@ucr.edu>
Sent: Sunday, March 5, 2023 4:07 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Amy Litt
1250 San Cristobal Drive

Riverside, CA 92506
amy.litt@ucr.edu

Letter I-493

Amy Litt
March 5, 2023

I-493.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: ANTHONY SCIMIA JR <tscimia@sbcglobal.net>
Sent: Sunday, March 5, 2023 11:52 AM
To: Dan Fairbanks
Cc: Anthony Scimia Jr; Jennifer Laughlin
Subject: Upper plateau warehouses

Please oppose any warehouses within close proximity to residential homes. Our beautiful neighborhoods are beginning to look like a truck stop. Our quality of life has been changing for the negative. Diesel emissions, noise pollution around the clock, grid lock traffic. There is no good reason to build industrial buildings so close to residential homes. City planners please use your planning knowledge to do the right thing for our residents of Riverside.
Thank you.
Anthony Scimia
20829 Indigo Point
Riverside Ca, 92508

I-494.1



I-494.2



I-494.3

Sent from my iPhone

Letter I-494

Anthony Scimia Jr.
March 5, 2023

I-494.1 This comment expresses opposition to the Project's location near residential areas, specifically regarding potential air quality and noise impacts and traffic. The comment also expresses concerns that the neighborhood is turning into a truck stop with visual examples of truck cabs parked in neighborhoods. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Recirculated Section 4.2, Air Quality, disclosed the Project's air quality impacts, Section 4.11, Noise, of the Draft EIR determined the Project's noise impacts to sensitive receivers, and the Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. March JPA does not have the authority to govern where homeowners choose to park truck cabs. March JPA has defined truck routes that all drivers are required to follow. As such, the comment does not raise specific issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR.

I-494.2 This comment is an attached photo of a truck cab parked in a residential driveway. This comment does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided.

I-494.3 This comment is an attached photo of a truck cab parked in front of a residence. This comment does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided.

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From: BARBARA KERR <bk1227@aol.com>
Sent: Sunday, March 5, 2023 2:55 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to voice my concerns, Barbara Kerr
8710 Windmill Pl.
Riverside Ca. 92508

Sent from my iPhone

Letter I-495

Barbara Kerr
March 5, 2023

I-495.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Benjamin Murphy <benmurphy8854@gmail.com>
Sent: Sunday, March 5, 2023 3:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

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I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Ben Murphy
8546 Millpond Pl, 92508

Sent from my iPhone

Letter I-496

Ben Murphy
March 5, 2023

I-496.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Christopher Gate <gatedad61@aol.com>
Sent: Sunday, March 5, 2023 1:39 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have. Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16? Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate. Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers. It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project. Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates. Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity

to staff these warehouses locally. Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023. Sincerely, <include name, address, email in signature line>

Letter I-497

Christopher Gate
March 5, 2023

I-497.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Christopher Gate <gatedad61@aol.com>
Sent: Sunday, March 5, 2023 1:39 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site? We would ask for significant mitigations to be put in place to reduce the impacts on local residents. 1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing. I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028. I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected? Thank you for the opportunity to comment. Sincerely, <include name, address, email in signature line>

Letter I-498

Christopher Gate
March 5, 2023

I-498.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Christopher Gate <gatedad61@aol.com>
Sent: Sunday, March 5, 2023 1:41 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies? In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan? As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated, "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green

building industry are preferred. Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process. Thank you for letting me comment on this.

Chris Gate
8643 Newton Pl
Riverside

Letter I-499

Christopher Gate
March 5, 2023

I-499.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Christopher Gate <gatedad61@aol.com>
Sent: Sunday, March 5, 2023 1:44 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have. Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16? Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate. Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers. It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project. Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates. Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old

I-500.1

SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally. Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.
An additional step March JPA should do is require only clean air CNG trucks access warehouses in the area.

I-500.1 Cont.

I-500.2

Sincerely,
Chris Gate
8643 Newton Pl
Riverside

Letter I-500

Christopher Gate
March 5, 2023

I-500.1 This comment is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

I-500.2 This comment suggests that March JPA allow only clean air CNG trucks to access area warehouses. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when commercially available for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030. In response to this comment, please see Recirculated Section 4.2, Air Quality.

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From: Christopher Gate <gatedad61@aol.com>
Sent: Sunday, March 5, 2023 1:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you! Sincerely,
Chris Gate
8643 Newton Pl
Riverside

Letter I-501

Christopher Gate
March 5, 2023

I-501.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Christine Heinemann <caheinemann@gmail.com>
Sent: Sunday, March 5, 2023 6:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Christine Heinemann
8715 Morninglight Circle
Riverside, CA 92508

Letter I-502

Christine Heinemann
March 5, 2023

I-502.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Christine Heinemann <caheinemann@gmail.com>
Sent: Sunday, March 5, 2023 6:41 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Christine Heinemann
8715 Morninglight Circle

Letter I-503

Christine Heinemann
March 5, 2023

I-503.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: D Divani <soheildivani@gmail.com>
Sent: Sunday, March 5, 2023 1:50 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

David Divani
19688 Mt Wasatch Dr, Riverside, CA 92508
soheildivani@gmail.com

Letter I-504

David Divani
March 5, 2023

I-504.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Danela bernal <danelabernal@gmail.com>
Sent: Sunday, March 5, 2023 3:16 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,wVn0klhYw2dY08QLYuhn1PVjIwjZ4Rx3L5U__20k1F7445ISfyEpqjAWxG_GQ98csDOE0asHFn-61erv_iLFKVzkaKJmbkLtbGUVcYhiqaw10Q84sg,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone

(https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,M5uzljKNay1eW325FWwnnfJuvfADu4LLXvhu-141TvlFslYlC1Cu-E_z2unpww2Ok51FmSxrh2TLrLFtyMV_l9XVRo_SH-e8KNUzlrwkYS09bwk,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Danela Jimenez
8956 Niagara Ct Riverside, Ca 92508
danelabernal@gmail.com

Sent from my iPhone

Letter I-505

Danela Jimenez
March 5, 2023

I-505.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Danela bernal <danelabernal@gmail.com>
Sent: Sunday, March 5, 2023 3:17 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Danela Jimenez
8956 Niagara Ct Riverside, Ca 92508
danelabernal@gmail.com

Sent from my iPhone

Letter I-506

Danela Jimenez
March 5, 2023

I-506.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: christian craddock <c_p_craddock@yahoo.com>
Sent: Sunday, March 5, 2023 11:56 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have. Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16? Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate. Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers. It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project. Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates. Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally. Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023. Sincerely,

Dr. Christian Craddock

Letter I-507

Dr. Christian Craddock
March 5, 2023

I-507.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: christian craddock <c_p_craddock@yahoo.com>
Sent: Sunday, March 5, 2023 12:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Wildlife: 1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB. 2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old. Plant life: 1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life? 2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted. I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced? Thank you for allowing me to provide comments on this project. Sincerely,
Dr Christian Craddock


Virus-free.www.avg.com

Letter I-508

Dr. Christian Craddock
March 5, 2023

I-508.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: E E_____Ha__ <eestrella25@msn.com>
Sent: Sunday, March 5, 2023 11:56 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? I-509.1

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

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

I have been told, from a very reliable source, that Riverside Police Department no longer has Commercial Enforcement due to budget cuts implemented by the Riverside City Council. So, which agency is going to be responsible for making sure that these big trucks don't come down residential streets, specifically Barton, when you make it through from Alessandro? Barton, south of Alessandro, is not wide enough for heavy traffic, much less big rig trucks. There are residential homes on that part of the street. The homes on the east side of Barton face Barton. It's a very, very bad idea to make that part of Barton go through to Van Buren. I-509.2

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

I-509.3

Sincerely,
Elisa Estrella - Hahn, 20021 Camino Del Sol, Riverside, CA, 92508
eestrella25@msn.com

Letter I-509

Elisa Estrella-Hahn
March 5, 2023

I-509.1 This comment is a portion of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-509.2 This comment questions who will be responsible for enforcement for trucks associated with the proposed Project and also expresses concerns about truck traffic through neighborhoods with the extension of Barton. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-509.3 This comment is a portion of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: E E_____Ha__ <eestrella25@msn.com>
Sent: Sunday, March 5, 2023 11:58 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Elisa Estrella-Hahn, 20021 CaminoDelSol, Riverside, CA, 92508
eestrella25@msn.com

Letter I-510

Elisa Estrella-Hahn
March 5, 2023

I-510.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: E E_____Ha__ <eestrella25@msn.com>
Sent: Sunday, March 5, 2023 11:59 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Elisa Estrella-Hahn, 20021 Camino Del Sol, Riverside, CA, 92508
eestrella25@msn.com

Letter I-511

Elisa Estrella-Hahn
March 5, 2023

I-511.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: E E_____Ha__ <eestrella25@msn.com>
Sent: Sunday, March 5, 2023 12:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Elisa Estrella-Hahn, 20021 Camino Del Sol, Riverside, CA, 92508
eestrella25@msn.com

Letter I-512

Elisa Estrella-Hahn
March 5, 2023

I-512.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: E E_____Ha__ <eestrella25@msn.com>
Sent: Sunday, March 5, 2023 12:01 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Elisa Estrella-Hahn, 20021 Camino Del Sol, Riverside, CA, 92508
eestrella25@msn.com

Letter I-513

Elisa Estrella-Hahn
March 5, 2023

I-513.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: E E_____Ha__ <eestrella25@msn.com>
Sent: Sunday, March 5, 2023 12:02 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Elisa Estrella-Hahn, 20021 Camino Del Sol, Riverside, CA, 92508
eestrella25@msn.com

Letter I-514

Elisa Estrella-Hahn
March 5, 2023

I-514.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: E E_____Ha__ <eestrella25@msn.com>
Sent: Sunday, March 5, 2023 12:03 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Elisa Estrella-Hahn, 20021 Camino Del Sol, Riverside, CA, 92508
eestrella25@msn.com

Letter I-515

Elisa Estrella-Hahn
March 5, 2023

I-515.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Gayle Dicarlantonio <gayledmail@gmail.com>
Sent: Sunday, March 5, 2023 9:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Gayle DiCarlantonio
Riverside, CA
gayledmail@gmail.com

Letter I-516

Gayle DiCarlantonio
March 5, 2023

I-516.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: The Harvilla Family <harvilla4@msn.com>
Sent: Sunday, March 5, 2023 5:38 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public Comment for the West Campus Upper Plateau Project, EIR, State Clearinghouse No. 2021110304 - Wildlife and Biology

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. I feel a more thorough survey is necessary.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

George Harvilla
8736 Desert Rock lane
Riverside, CA 92508

Letter I-517

George Harvilla
March 5, 2023

I-517.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: The Harvilla Family <harvilla4@msn.com>
Sent: Sunday, March 5, 2023 6:23 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public Comment for the West Campus Upper Plateau Project, EIR, State Clearinghouse No. 2021110304 - Primary Objectives

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
RE: Public Comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304 – Primary Objectives

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. I-518.1

This is a project looking for reasons to be built. I listed the primary objectives stated in the EIR, followed by my comments:

• Provide increased job opportunities for local residents through the provision of employment generating businesses.

The March JPA has already replaced all of the jobs that were lost when March AFB was realigned. During a recent drive along Meridian Parkway and Van Buren Boulevard, I saw many signs on the existing warehouses stating they are hiring. So, the existing warehouses cannot even find enough employees. The U.S. unemployment rate is at its lowest point in half a century. Additional low-paying warehouse jobs are not needed in the Orangecrest neighborhood. I-518.2

• Provide open space amenities to serve the region.

The proposed area IS ALREAY AN OPEN SPACE! How can building warehouses on it provide more? They can only decrease the amount of open space that exists now. I-518.3

• Provide an active park consistent with the 2009 Safety Study prepared by March JPA.

A better park plan would be to leave the site as is, with some improvements to the trails. I-518.4

• Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Development Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.

None of these improvements are necessary. Orangecrest has been fine for the past 35 years without these streets. They are not needed.

I-518.5

• Remove and redevelop a majority of the former munitions storage area of the March AFB.

The bunkers have become part of the landscape of the Upper Plateau. Hikers respect the fences and don't bother the bunkers, and the bunkers don't bother the hikers. Demolition costs of the bunkers will be very high.

I-518.6

• Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient, and comfortable.

This is a phony argument. I ride my bike along the Krameria Avenue bike lanes between all the warehouses, and I am always the only bicyclist. I don't recall ever seeing another bicyclist on Krameria. As much as you are trying to encourage public transportation, you will have a hard time getting Orangecrest residents out of their cars.

I-518.7

Please remove the project objectives which you cannot substantiate/defend.

Thank you for allowing me to provide comments on this project.

I-518.8

George Harvilla
8736 Desert Rock lane
Riverside, CA 92508

Letter I-518

George Harvilla
March 5, 2023

I-518.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 SF of warehouse use, 528,951 SF of office use, and 160,921 SF of retail use. The comment does not raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-518.2 This comment questions the Project's objective to provide increased job opportunities, stating March JPA has already replaced the jobs lost through March ARB realignment and questions whether the Project's jobs would be filled by local residents. The Project would create over 2,600 new permanent onsite jobs, and over 1,000 temporary construction jobs including union labor. In response to this comment, please see Topical Response 5 – Jobs. The comment raises concerns regarding vacancies in area warehouses. According to Table 1 of the draft "Economic Impact Analysis of the March Joint Powers Authority (MJPA) Development Projects" by Dr. Qisheng Pan presents 2023 employment data for the various existing developments within the March JPA Planning Area (Appendix U), there are few vacancies within the March JPA Planning Area.

I-518.3 This comment questions the Project's objective to provide open space amenities when the Project site is currently open space. The intent of the Project Objectives is to outline all aspects of the Project, not just one component of the Project. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

I-518.4 This comment objects to the Project's objective to provide an active park and requests only some improvements to the existing trails. This comment does not raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. Under the 2003 Settlement Agreement with the Center for Community Action and Environmental Justice and Community Alliance for Riverside's Economy & Environment, a 60-acre active park was required to be developed within the March JPA Planning Area. Under the 2012 CBD Settlement Agreement (Appendix S), the Project site was identified to incorporate a 60-acre park. Please see Topical Response 4 – Project Consistency, for additional information regarding the Project's consistency with these settlement agreements. Under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities,

drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete. The Project would the existing trail network in Upper Plateau that Riverside and County of Riverside residents use daily.

I-518.5 This comment objects to the Project's objective to extend the roadway network within the Project site as unnecessary. This comment does not raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. The Project would extend and connect Barton Street per the City of Riverside's General Plan Circulation Element – enhancing public safety access and reducing response times. The Barton Street extension would also allow surrounding residents direct access to the Park and access points for existing trails in the Conservation Easement for passive recreational use. Only a gated emergency vehicle access road would connect Barton Street and Cactus Avenue. Campus Development traffic would be funneled east along Cactus Avenue towards I-215. Extending Brown Street will also enhance local connectivity.

I-518.6 This comment objects to the Project's objective to remove and redevelop the structures in the Weapons Storage Area as they do not affect use of the site and would be expensive to remove. This comment does not raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. Currently, the Weapons Storage Area is fenced off and inaccessible to the public. Upon completion of the Project, there will be dual 6' bike lanes and sidewalks throughout the Specific Plan Area. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers.

I-518.7 This comment objects to the Project's objective to encourage the use of alternative modes of transportation and relays the commenter's experience utilizing the bike lanes in the vicinity of other development within March JPA. This comment does not raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. Upon completion of the Project, there will be dual 6' bike lanes and sidewalks throughout the Specific Plan Area which will connect with existing non-motorized circulation systems, improving local connectivity and access.

I-518.8 This comment requests the removal of the Project objectives identified in the letter. CEQA Guidelines Section 15124(b) states that an EIR shall include, "A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits." Consistent with CEQA Guidelines Section 15124(b), the Draft EIR includes a complete list of project objectives, all of which can be substantiated and defended as being components of the Project, as proposed. This comment does not raise any specific issues, questions or concerns about the adequacy or defensibility of the Project Objectives; as such, no further response is provided.

From: The Harvilla Family <harvilla4@msn.com>
Sent: Sunday, March 5, 2023 6:53 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public Comment on Record for the West Campus Upper Plateau Project, EIR, State Clearinghouse No. 2021110304 - Air Quality

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public Comment on Record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304 – Air Quality

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

The draft EIR does not properly analyze the Project's impact on air quality. The project applicant conceded that there will be "Significant and Unavoidable" air quality impacts on surrounding residents. This is not acceptable, since I will have to breath poisonous, carcinogenic diesel fumes every day. There are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a

community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1) Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2) Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

George Harvilla
8736 Desert Rock Lane
Riverside, CA 92508

Letter I-519

George Harvilla
March 5, 2023

I-519.1 This comment letter is a slightly modified version of Form Letter B – Air Quality, which adds the following to the second paragraph: "This is not acceptable, since I will have to breath poisonous, carcinogenic diesel fumes every day." The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter B Response.

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From: The Harvilla Family <harvilla4@msn.com>
Sent: Sunday, March 5, 2023 7:09 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public Comment on Record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304 – Land Use and Noise

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public Comment on Record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304 – Land Use and Noise

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. **Why did each of the alternative plans include 143 acres of industrial zoning?** The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. **Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.** I-520.1

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; **how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?**

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions**"** and **"**Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." **How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Please ensure your** I-520.2

noise tests are done in the early morning hours as well as during normal business hours. Orangecrest residents have stated they hear the backup devices of big rigs at the newly-constructed warehouses in the early morning hours (between midnight and 7:00 a.m.), and this wakes them up. Noise is much more obvious to the listener in quiet, nighttime conditions. Please study this thoroughly.

I-520.2 Cont.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). **In what specific ways have you incorporated Community Preference in the development of your plan?**

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

> "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
> b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
> d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

I-520.3 Cont.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

George Harvilla
8736 Desert Rock Lane
Riverside, CA 92508

Letter I-520

George Harvilla
March 5, 2023

I-520.1 This comment is the first half of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-520.2 This comment asks that noise tests be done in the early morning as well as during normal business hours given that surrounding residents have stated they hear the backup devices in the early morning hours. As discussed in Section 4.11, Noise, of the Draft EIR, to assess the existing noise level environment, 24-hour noise level measurements (including early morning hours as well as during normal business hours) were taken at eight locations within the public right-of-way throughout the Project study area on Thursday July 22, 2021. The receiver locations were selected to describe and document the existing noise environment within the Project study area. The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient hourly noise levels surrounding the Project site. Table 4.11-1 identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. As shown in Table 4.11-1, average daytime noise levels ranged between 47.3 dBA L_{eq} and 61.5 dBA L_{eq}, while nighttime noise levels ranged between 43.9 dBA L_{eq} and 56.6 dBA L_{eq}. As shown in Table 4.11-28, daytime Project noise level increases at receiver locations would range from 0.1 dBA L_{eq} to 2.0 dBA L_{eq}, below the increase threshold of 5.0 dBA L_{eq}. As shown in Table 4.11-29, nighttime Project noise level increases at receiver locations would range from 0.1 dBA L_{eq} to 2.3 dBA L_{eq}, below the increase threshold of 5.0 dBA L_{eq}. Based on the analysis included within Section 4.11, as well as the Project Noise Study (Appendix M-1), operational noise impacts at residences would be less than significant and would not require mitigation.

I-520.3 This comment is the second half of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: The Harvilla Family <harvilla4@msn.com>
Sent: Sunday, March 5, 2023 7:16 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public Comment on Record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304 - Traffic

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public Comment on Record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304 - Traffic

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

I-521.1

The draft EIR does not properly analyze the Project's traffic impacts.

I have serious concerns about the traffic section of the document. First and foremost, **the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. It should also include the 91 Freeway, from Riverside to the ports.** The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. **How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built?**

I-521.2

I-521.3

Please redo your traffic section to include the 215, 215/60, and 91 corridors, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project.

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please rewrite your traffic study to reflect the actual conditions of the surrounding area. Thank you.

I-521.3
Cont.

Sincerely,

George Harvilla
8736 Desert Rock Lane
Riverside, CA 92508

Letter I-521

George Harvilla
March 5, 2023

I-521.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 SF of warehouse use, 528,951 SF of office use, and 160,921 SF of retail use. The comment raises general concerns about the traffic analysis. Responses to specific comments are provided below.

I-521.2 This comment states that the traffic analysis does not include the 215 Freeway or the 215/60 corridor and that it should also include the 91 Freeway from Riverside to the ports. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. Caltrans does not utilize peak hour intersection operations analysis and instead utilizes VMT in compliance with SB 743 through its VMT-Focused Transportation Impact Study Guide (Caltrans VMT Guide), dated May 20, 2020. The March JPA Traffic Impact Study Guidelines were adopted before the Caltrans VMT Guide and reference superseded Caltrans guidance. The Project VMT Analysis (Appendix N-1) was prepared in compliance with the Caltrans VMT Guide and meets the transportation analysis requirement for Caltrans. For additional discussion regarding the 215 Freeway and the 215/60 corridor, please see Form Letter G Response. The Project Traffic Analysis (Appendix N-2) analyzed the Project's effects on traffic on truck routes, other roadways, and intersections located within the March JPA, City of Riverside, City of Moreno Valley, and County of Riverside. The scope of the study area was based on input provided by March JPA, the City of Riverside, City of Moreno Valley, and County of Riverside. Study area intersections at a minimum include locations where the Project would contribute 50 or more peak hour trips (consistent with the minimum standards used by these same agencies). Notwithstanding the Caltrans VMT Guide, the 91 Freeway is well outside of the geographic region in which the analysis was based.

I-521.3 This comment is the same as a portion of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: The Harvilla Family <harvilla4@msn.com>
Sent: Sunday, March 5, 2023 7:22 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public Comment on Record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304 – Jobs and Greenhouse Gases

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public Comment on Record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304 – Jobs and Greenhouse Gases

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's impact on jobs and greenhouse gases.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have. This area does not need more low-paying warehouse jobs.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor

force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment.

Sincerely,

George Harvilla
8736 Desert Rock Lane
Riverside, CA 92508

Letter I-522

George Harvilla
March 5, 2023

I-522.1 This comment letter is a slightly modified version of Form Letter F – Jobs with the following sentence added: "This area does not need more low-paying warehouse jobs." The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter F Response.

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From: Greta Kaas-Lent <gretakaaslent@gmail.com>
Sent: Sunday, March 5, 2023 4:16 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmsil.com
Subject: West Campus Upper Plateau, Environmental Impact Report, Clearinghouse No. 2021110304

March 6, 2023

Dan Fairbanks
Planning Director
March Point Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

On behalf of Riverside League of Women Voters (LWV) Southwest Unit, we are writing to submit comments on the draft Environmental Impact Report for the Proposed West Campus Upper Plateau.

The LWV is a non-partisan organization with strong positions on many aspects relative to the West Campus Upper Plateau. Our membership includes Perris, Menifee, Hemet, Murrieta, Lake Elsinore, Temecula, Corona and Norco. I-523.1

1. **Land Use, City and County of Riverside**:
It is critical to protect the quality of life and the preservation of open space. To achieve this we strongly support significant citizen input and viewpoints. I-523.2

2. Environmental Concerns:
The Projects's warehouses are sited within 500 feet of residents, a proposed park and reserved passive recreation area and is less than quarter of a mile from a preschool. Air quality needs to be a top priority. I-523.3
One example on air quality impact would be to require a minimum of 50% of delivery be battery electric vehicles at the project opening date of 2028, increasing to 100% by 2031. I-523.4

3. Traffic Congestion:
It is important that your data is accurate in how congestion will be impacting on local streets and freeways. The 215 is already overburdened with truck traffic. It is not clear that you have accounted for the reality that truck drivers do not follow agreed-upon routes. I-523.5

Thank you for allowing us to provide comments on this project. We know that you will want to do what is best for current residents as well as those considering relocating to Riverside. I-523.6

Members of the League of Women Voters - SW Unit
Post Office Box 20785
Riverside, CA 92516-0785

Letter I-523

Members of the League of Women Voters – SW Unit
March 5, 2023

I-523.1 This comment is introductory in nature and does not raise any issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided.

I-523.2 This comment stresses that it is critical to protect the quality of life and the preservation of open space. The comment requests citizen input and viewpoints. This comment does not raise any issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided.

I-523.3 This comment describes the location of the Campus Development relative to residents, the proposed Park, and an existing preschool. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. No specific issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided.

I-523.4 This comment requests air quality mitigation requiring a minimum of 50% of delivery be battery electric vehicles at the Project opening date of 2028, and increasing to 100% by 2031. MM-AQ-20 requires tenants utilize heavy-duty trucks with a model year of 2014 or later from the start of operations and transition to zero-emissions vehicles by 2030 or when commercially available for the intended application. MM-AQ-20 further requires tenants to utilize a "clean fleet" of vehicles/delivery vans/trucks as follows: 33% at start of operations, 65% by 2026, 80% by 2028, and 100% by 2030. In further response to this comment, please see Recirculated Section 4.2, Air Quality.

I-523.5 This comment discusses potential traffic congestion and truck route enforcement. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction

addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Regarding the I-215 freeway, please see Form Letter G, Traffic, Response.

I-523.6 This comment is conclusory in nature and does not raise any issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided.

From: Greg Russell <running.greg@gmail.com>
Sent: Sunday, March 5, 2023 11:35 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Greg Russell
6081 Del Ray Ct.

Letter I-524

Greg Russell
March 5, 2023

I-524.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Greg Russell <running.greg@gmail.com>
Sent: Sunday, March 5, 2023 11:35 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Greg Russell
6081 Del Ray Ct.
Riverside, CA 92506
running.greg@gmail.com

Letter I-525

Greg Russell
March 5, 2023

I-525.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Greg Russell <running.greg@gmail.com>
Sent: Sunday, March 5, 2023 11:36 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Greg Russell
6081 Del Ray Ct.
Riverside, CA 92506
running.greg@gmail.com

Letter I-526

Greg Russell
March 5, 2023

I-526.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Georgia Renne <grenne@earthlink.net>
Sent: Sunday, March 5, 2023 5:46 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project

Mr. Dan Fairbanks, AICP

Planning Director

March Joint Powers Authority (March JPA)

14205 Meridian Parkway, Suite 140

Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

When I moved to the Orangecrest area twenty-three years ago, as a Riverside native, I chose my new home because it did have neighboring areas of wilderness. Now, as a UCCE Master Gardener of Riverside County, I have serious concerns about the shrinking of open spaces and destruction of habitat. I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife

1. The applicant should expand their analysis to include the

   Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.

2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Georgia Renne

20709 Stony Brook Circle

Letter I-527

Georgia Renne
March 5, 2023

I-527.1 This comment letter is a variation of Form Letter C – Biological Resources, with the additions to the second paragraph detailing commenter's personal experience. The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter C Response.

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From: Greg Renne <gregrenne@hotmail.com>
Sent: Sunday, March 5, 2023 12:06 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Greg Renne
20709 Stony Brook Circle
Riverside, CA 92508
gregrenne@hotmail.com

Letter I-528

Greg Renne
March 5, 2023

I-528.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: mlviafora@gmail.com
Sent: Sunday, March 5, 2023 2:54 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: EIR-Letter.docx

Importance: High

March 5, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City and County of Riverside. The Project's warehouses are sited within 500 feet of residents, which include a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a Church/preschool and a existing park where outdoor youth sports are held and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-529.1

I have serious concerns about the shrinking of open spaces, destruction of habitat and vista's. We as a community, also ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.
3. We have trees behind our home that the MJPA has never allowed us to touch due to birds that mate there during the year. We had neighbors that were heavily fined for cutting down the trees. How will these birds be protected throughout this region? I-529.2
4. They say wildlife can sense danger to their habitat long before humans react. The developments along the Meridian corridor have forced the migration of habitat into the yards and arterials of the surrounding communities. How does JPA propose to reverse this trend? I-529.3

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I-529.4

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

In addition, I have concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:

1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
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4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

I-529.5

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchlorothylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

Furthermore, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed. If there are hazardous materials present, they must be removed prior to demolition and grading to avoid airborne pollution and contamination of the surrounding aquifers.

I-529.6

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than

I-529.7

a year. **Why did each of the alternative plans include 143 acres of industrial zoning?** The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. **Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.**

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; **how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?**

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions**"** and **"**Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." **How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.**

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As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

I-529.7 Cont.

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> "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
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Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park,

mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

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I personally have serious concerns about the traffic section of the document. First and foremost, **the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses.** The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, Meridian, Trautwein, Washington, Van Buren, Harley Knox and Cajalco Rd. **How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built?**

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

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

I-529.8

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

Anyone driving down Central, Chicago, Trautwein, Alessandro, Washington, Madison, La Sierra, Wood Rd., Calico Rd., or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area.

The project applicant should also concede, that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it

I-529.9

is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA produce a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I-529.9 Cont.

In the 1960's, 70's and 80's the experts called them "summer colds", resulting from a combination of outdoor childhood games and smog so dense that you could not see across the street. It took approximately 35 years to clean the skies of the Inland Empire. I am an old man now with many grandchildren and I fear left unchecked that the increased smog of the last 10 years will allow them to experience "summer colds", of my youth.

I-529.10

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, which is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

I-529.11

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

A responsible developer, who is engaged with the community would consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

I-529.11 Cont.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

I-529.12

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of

building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

I-529.12 Cont.

Sincerely,

John and Mary Viafora
20828 Indigo Point
Riverside, CA 92508

March 5, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City and County of Riverside. The Project's warehouses are sited within 500 feet of residents, which include a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a Church/preschool and a existing park where outdoor youth sports are held and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces, destruction of habitat and vista's. We as a community, also ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. I-529.13

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.
3. We have trees behind our home that the MJPA has never allowed us to touch due to birds that mate there during the year. We had neighbors that were heavily fined for cutting down the trees. How will these birds be protected throughout this region?
4. They say wildlife can sense danger to their habitat long before humans react. The developments along the Meridian corridor have forced the migration of habitat into the yards and arterials of the surrounding communities. How does JPA propose to reverse this trend?

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess

the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

In addition, I have concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:

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As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. **Why did each of the alternative plans include 143 acres of industrial zoning?** The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. **Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.**

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I-529.13 Cont.

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

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

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

Anyone driving down Central, Chicago, Trautwein, Alessandro, Washington, Madison, La Sierra, Wood Rd., Calico Rd., or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area.

The project applicant should also concede, that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

I-529.13 Cont.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to

electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA produce a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

In the 1960's, 70's and 80's the experts called them "summer colds", resulting from a combination of outdoor childhood games and smog so dense that you could not see across the street. It took approximately 35 years to clean the skies of the Inland Empire. I am an old man now with many grandchildren and I fear left unchecked that the increased smog of the last 10 years will allow them to experience "summer colds", of my youth.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

I-529.13 Cont.

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, which is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

A responsible developer, who is engaged with the community would consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

I-529.13
Cont.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the

correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

I-529.13 Cont.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

John and Mary Viafora
20828 Indigo Point
Riverside, CA 92508

Letter I-529

John & Mary Viafora
March 5, 2023

I-529.1 This comment is the first half of Form Letter C – Biological Resources with minor text edits. The text edits to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter C Response.

I-529.2 This comment questions how nesting birds will be protected. As discussed in Section 4.3, Biological Resources, the Project site supports suitable habitat for nesting birds. The Project is required to comply with MM-BIO-7 (Nesting Bird Avoidance and Minimization Measures). With implementation of MM-BIO-7, impacts to nesting birds would be less than significant.

I-529.3 This comment raises concerns that development will force migration of habitat into the surrounding communities. As part of the proposed Project, a Conservation Easement would be established to permanently maintain open space for the wildlife species in the Project vicinity. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the wildlife habitat values of the Conservation Easement in perpetuity.

As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), neither the Project site nor any areas in the vicinity of the Project site are within any of the 38 designated MSHCP habitat linkages. Additionally, the analysis within the Draft EIR evaluated the potential impacts upon migration corridors for wildlife species. As discussed in Section 4.3, Biological Resources, the Project site likely serves as a local wildlife corridor between undeveloped areas to the south of the site and the open space areas immediately north of the Project site, north of Alessandro Boulevard, which includes Sycamore Canyon approximately 4,000 feet to the northwest of the site. The Project site also likely serves as a stepping stone corridor for avian species moving through this area, including least Bell's vireo which occur in Meridian Conservation Areas 1 and 2 to the south of the site north and south of Van Buren Boulevard. With full build-out of the Specific Plan Area, an undeveloped corridor would be retained immediately east of the site as part of the Conservation Easement. This undeveloped land would maintain a corridor between site development and nearby residential development, including significant areas of riparian habitat. (Figure 4.3-4 in the Draft EIR). To further buffer the Conservation Easement, the Specific Plan proposes three open space areas, including an additional 30-foot-wide landscaped buffer on the proposed parcels to the north, west, south, and southeast of the Specific Plan Area.

Finally, the Specific Plan Area includes the installation of three wildlife crossings: two under Cactus Avenue in the eastern portion of the Study Area, which will provide additional opportunities for wildlife to safely move north to south through the eastern Conservation Easement corridor; and one beneath Brown Street that will facilitate wildlife movement east and west through the Conservation Easement corridor. The two Cactus Avenue crossings will be soft-bottomed culverts approximately 8 feet in height, 20 feet in width, and 240 feet in length The Brown Street crossing will consist of a soft-bottomed culvert approximately 8 feet in height, 20 feet in width, and 150 feet long. These specifications follow the CBD Settlement Agreement, which prescribed design standards suitable to accommodate local, land-locomotive species (Appendix S of the Draft EIR). Additionally, 60 acres of open space/park is planned for the western portion of the project that buffers the existing residential

uses west of the site, which will be included within the project's General Plan Amendment. This western open space area will still allow for the movement of wildlife to the west of the project as well. As such, impacts on wildlife corridors would be less than significant. (Appendix D-2)

I-529.4 This comment is the second half of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

I-529.5 This comment is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

I-529.6 This comment states that if hazardous materials are present, they must be removed prior to demolition and grading to avoid airborne pollution and contamination. In response to this comment, please see Recirculated Section 4.8, Hazards and Hazardous Materials, which provides further detailed information about the environmental conditions at the Project site. As discussed therein, no hazardous materials risks are present at the site.

I-529.7 This comment is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-529.8 This comment is Form Letter G – Traffic. The commenter also adds Meridian, Trautwein, Washington, Harley Knox and Cajalco Road as representative streets excluded from the traffic analysis. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With regard to the additional roads identified in the comment, the analysis includes Meridian Parkway from Alessandro Boulevard to Van Buren Boulevard and the following intersections:

- Washington Street and Van Buren Boulevard
- Trautwein Road and Alessandro Boulevard
- Trautwein Road and Grove Community Drive
- Trautwein Road and Orange Terrace Parkway
- Trautwein Road and Van Buren Boulevard
- Meridian Parkway and Alessandro Boulevard
- Meridian Parkway and Cactus Avenue
- Meridian Parkway and Van Buren Boulevard

Harley Knox and Cajalco Road were not included because the Project is not anticipated to add 50 or more peak hour trips to any of those intersections. In response to the remainder of this comment, please see Form Letter G Response.

I-529.9 This comment is Form Letter B – Air Quality with non-substantive modifications. The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter B Response.

I-529.10 This comment discusses "summer colds" experienced in the 1960's, 1970's, and 1980's. The comment references the dense smog that was present during those decades. As discussed in Recirculated Section 4.2, Air Quality, regional air quality has improved over the past 35 years, even with the growth experienced in the region. Additionally, the air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments, as detailed in Recirculated Section 4.2, Air Quality. The Project is implementing all feasible mitigation measures to address potential air quality impacts.

I-529.11 This comment is Form Letter F – Jobs with non-substantive modifications. The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter F Response.

I-529.12 This comment is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-529.13 This comment is a duplicate letter for which responses were provided in Responses I-529.1 through I-529.12 above. As such, please see Responses I-529.1 through I-529.12 above.

INTENTIONALLY LEFT BLANK

From: Joan Donahue <donahue.joan@att.net>
Sent: Sunday, March 5, 2023 8:27 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: LWVR Letter Draft EIR document Orangecrest.pdf



March 6, 2023

Joan Donahue, President
League of Women Voters Riverside
Post Office Box 20785
Riverside, CA 92516-0785
Donahue.joan@att.net

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

The League of Women Voters Riverside writes in support of a letter sent to your office from Vicki Broach, a long-time League Member and former staff attorney for the state Court of Appeal. Ms. Broach has 20 years of experience conducting appellate review of CEQA cases. We strongly support Ms. Broach's opinion that the EIR in its present draft form will receive an unfavorable review by the Superior Court and the Court of Appeal. I-530.1

Air quality impacts The negative effects on air quality caused by warehouses and the truck trips they generate are well documented. Strikingly, diesel PM accounts for 70% of cancers attributable to toxic air contaminants. Local residents are legitimately worried about the health effects for themselves, their families, and their community. I-530.2

Land Use and Planning, Population and Housing Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project. Clearly, community feedback is not being "seriously" and "carefully" considered.

The historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings.

All March JPA planning documents indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

I-530.3

The Draft EIR acknowledges the City of Riverside is mandated by state law to provide adequate housing. But it does not recognize that the City is failing to meet its state-mandated goals. The EIR should be corrected to reflect honestly the challenges presented by increasing the number of employees in an area that already lacks sufficient housing for its citizens.

I-530.4

Transportation In its present form, the Draft EIR is deficient in its traffic analysis. The analysis does not account for the 215/60 freeway corridor, which is within one mile of the site and would necessarily be the route the trucks would use.

The Final EIR should include consultation with CalTrans as part of its traffic analysis of the 215/60 corridor to reflect the reality of the impact of the project on the local area. The Final EIR should also include a plan for enforcement and maintenance that does not shift the burden to local jurisdictions and includes mitigation measures requiring the tenants to pay an infrastructure fee to local jurisdictions for the cost to our roads and to our police forces.

I-530.5

Job creation claims The claims about job creation are dubious. According to the Southern California Association of Governments Economic Report (SCAG), job growth in the Inland Empire since 2001 has resulted in numerous jobs but they tend to be relatively lower paying compared to other parts of the state and nation.

The report also discusses how the logistics industry "will likely go through a transformation as advances in automation and artificial intelligence displace workers." It warns: "There will be further costs from the expansion of the Logistics Sector if the result of the expansion means that there will be less industrial space available in the future for industries which are able to add more value to the economy per square foot."

I-530.6

League of Women Voters Riverside finds the Draft EIR is legally insufficient for multiple reasons. We urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. We also encourage the developer to consider non-industrial, alternative uses of the land for the sake of all Riverside city and county residents, as well those living adjacent to the site.

I-530.7

Sincerely,

Joan Donahue, President
League of Women Voters Riverside
(951) 479-2090
Donahue.joan@att.net

March 6, 2023

Joan Donahue, President
League of Women Voters Riverside
Post Office Box 20785
Riverside, CA 92516-0785
Donahue.joan@att.net

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

I-530.8

Dear Mr. Fairbanks:

The League of Women Voters Riverside writes in support of a letter sent to your office from Vicki Broach, a long-time League Member and former staff attorney for the state Court of Appeal. Ms. Broach has 20 years of experience conducting appellate review of CEQA cases. We strongly support Ms. Broach's opinion that the EIR in its present draft form will receive an unfavorable review by the Superior Court and the Court of Appeal.

Air quality impacts The negative effects on air quality caused by warehouses and the truck trips they generate are well documented. Strikingly, diesel PM accounts for 70% of cancers attributable to toxic air contaminants. Local residents are legitimately worried about the health effects for themselves, their families, and their community.

Land Use and Planning, Population and Housing Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project. Clearly, community feedback is not being "seriously" and "carefully" considered.

The historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never

considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings.

Moreover, all March JPA planning documents indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

The Draft EIR acknowledges the City of Riverside is mandated by state law to provide adequate housing. But it does not recognize that the City is failing to meet its state-mandated goals. The EIR should be corrected to reflect honestly the challenges presented by increasing the number of employees in an area that already lacks sufficient housing for its citizens.

Transportation In its present form, the Draft EIR is deficient in its traffic analysis. The analysis does not account for the 215/60 freeway corridor, which is within one mile of the site and would necessarily be the route the trucks would use.

The Final EIR should include consultation with CalTrans as part of its traffic analysis of the 215/60 corridor to reflect the reality of the impact of the project on the local area. The Final EIR should also include a plan for enforcement and maintenance that does not shift the burden to local jurisdictions and includes mitigation measures requiring the tenants to pay an infrastructure fee to local jurisdictions for the cost to our roads and to our police forces.

Job creation claims The claims about job creation are dubious. According to the Southern California Association of Governments Economic Report (SCAG), job growth in the Inland Empire since 2001 has resulted in numerous jobs but they tend to be relatively lower paying compared to other parts of the state and nation.

The report also discusses how the logistics industry "will likely go through a transformation as advances in automation and artificial intelligence displace workers." It warns: "There will be further costs from the expansion of the Logistics Sector if the result of the expansion means that there will be less industrial space available in the future for industries which are able to add more value to the economy per square foot."

League of Women Voters Riverside finds the Draft EIR is legally insufficient for multiple reasons. We urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. We also encourage the developer to consider non-industrial, alternative uses of the land for the sake of all Riverside city and county residents, as well those living adjacent to the site.

Sincerely,

Joan Donahue, President
League of Women Voters Riverside
(951) 479-2090
Donahue.joan@att.net

I-530.8 Cont.

Letter I-530

Joan Donahue
League of Women Voters
March 6, 2023

I-530.1 This comment offers support for Comment Letter I-160 and does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis within the Draft EIR. As such, no further response is provided.

I-530.2 This comment raises concerns about the health effects of diesel particulate matter (DPM). Recirculated Section 4.2, Air Quality, and Appendix C-2 assess the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks.

I-530.3 This comment is a condensed version of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-530.4 This comment states that the Draft EIR should be corrected to reflect that the City of Riverside is failing to meet its state mandated housing goals and that there is a lack of sufficient housing. Section 4.12, Population and Housing, of the Draft EIR determined that the Project would not result in the need to

construct new housing as the jobs generated by the Project could be filled by existing local residents. See also, Topical Response 5 – Jobs, for additional discussion regarding unemployment rates.

Since 1969, the State of California has required all local governments to adequately plan to meet the housing needs of everyone in the community. California's local governments meet this requirement by adopting housing plans as part of their General Plan.

The California Department of Housing and Community Development (HCD) is required to prepare a Regional Housing Needs Assessment (RHNA) for each Council of Governments in the State that identifies projected housing units needed for all economic segments based on Department of Finance population estimates. The Southern California Association of Governments (SCAG) is the Council of Governments for Riverside County (as well as Ventura, Los Angeles, Orange, San Bernardino, and Imperial Counties) and allocates to the six counties and 191 cities their fair share of the total RHNA housing needed for each income category. Each local government must demonstrate that it has planned to accommodate all of its regional housing need allocation in its Housing Element.

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the regional growth. Failure to do so has consequences for jurisdictions that are deemed non-compliant. HCD is authorized to review any action or failure to act by a local government that it determines is inconsistent with an adopted housing element or housing element law. This includes failure to implement program actions included in the housing element. HCD may revoke housing element compliance if the local government's actions do not comply with state law. Examples of penalties and consequences of housing element noncompliance:

- General Plan Inadequacy: The housing element is a mandatory element of the General Plan. When a jurisdiction's housing element is found to be out of compliance, its General Plan could be found inadequate, and therefore invalid. Local governments with an invalid General Plan can no longer make permitting decisions.
- Legal Suits and Attorney Fees Local governments with noncompliant housing elements are vulnerable to litigation from housing rights' organization, developers, and HCD. If a jurisdiction faces a court action stemming from its lack of compliance and either loses or settles the case, it often must pay substantial attorney fees to the plaintiff's attorneys in addition to the fees paid by its own attorneys. Potential consequences of lawsuits include: mandatory compliance within 120 days, suspension of local control on building matters, and court approval of housing developments.
- Loss of Permitting Authority: Courts have authority to take local government residential and nonresidential permit authority to bring the jurisdiction's General Plan and housing element into substantial compliance with State law. The court may suspend the locality's authority to issue building permits or grant zoning changes, variances, or subdivision map approvals – giving local governments a strong incentive to bring its housing element into compliance.
- Financial Penalties: Court-issued judgment directing the jurisdictions to bring its housing element in substantial compliance with state housing element law. If a jurisdiction's housing element continues to be found out of compliance, courts can multiply financial penalties by a factor of six.
- Court Receivership: Courts may appoint an agent with all powers necessary to remedy identified housing element deficiencies and bring the jurisdiction's housing element into substantial compliance with housing element law.

As such, it is in the City of Riverside's best interest to have an HCD-compliant and approved Housing Element as expeditiously as possible. Neither March JPA nor the Project applicant have the power or authority to force the City of Riverside to come into compliance with state laws.

I-530.5 This comment is a condensed version of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response. Commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[1]

I-530.6 This comment discusses general job trends in the Inland Empire and does not raise any specific issues, questions or concerns about the Project or the environmental analysis in the Draft EIR. Regarding automation, while existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. However, to further understand the job estimates for the Project, please see Topical Response 5 – Jobs.

I-530.7 This comment is conclusory in nature and requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

I-530.8 This comment is a duplicate letter for which responses were provided in Responses I-530.1 through I-530.7 above. As such, please see Responses I-530.1 through I-530.7 above.

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

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From: Janice Oien <gdojlo@yahoo.com>
Sent: Sunday, March 5, 2023 11:38 AM
To: Dan Fairbanks
Subject: Warehouses

I strongly oppose these buildings as a threat to my health and the health of our community i feel as though revenue is replacing common sense. The long term revenue is much greater benefit from smaller businesses and greater benefit to our communities Janice oien 92508
Sent from my iPhone

I-531.1

Letter I-531

Janice Oien
March 5, 2023

I-531.1 This comment expresses general opposition to the proposed Project because of health concerns and requests a non-industrial alternative. In response to this comment, please see Recirculated Section 4.2, Air Quality, for a discussion of air quality health impacts and Topical Response 8 - Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR.

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From: Jean Aklufi <jeanaklufi@gmail.com>
Sent: Sunday, March 5, 2023 5:20 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Jean Aklufi
6723 Canyon Hill Drive
Riverside, CA 92506

Letter I-532

Jean Aklufi
March 5, 2023

I-532.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Jean Aklufi <jeanaklufi@gmail.com>
Sent: Sunday, March 5, 2023 5:36 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-533.1

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. I lived in Riverside when driving from Moreno Valley to Riverside meant you could not see the town, the mountains, or anything toward LA. It was an impenetrable thick black Smog that we had to drive down into to get home. It took years for the smog to be cleared up and now again every year the air is getting worse. You are voting to increase the number of smog producing trucks in the area. How long before our grandchildren will be unable to see the mountains or the Inland Empire as they come down the grade from Moreno Valley. They also will know that they will have to breathe the foul air of the dark cloud they are driving into. Do you really want that? Then act responsibly. Think about the major consequences of your actions. Not just the relatively little bit of money you will make off of this but the long term consequences to the people who live here and hopefull will want to live here in the future. I-533.2

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site? I-533.3

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I-533.3 Cont.

Thank you for the opportunity to comment.

Sincerely,

Jean Aklufi
6723 Canyon Hill Dr.
Riverside, CA 92506

Letter I-533

Jean Aklufi
March 5, 2023

I-533.1 This comment is the same as the beginning of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-533.2 This comment discusses historic smog and air pollution and requests consideration of the long-term air quality effects due to additional truck traffic. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. Impacts associated with the health effects of air pollution were determined to be less than significant. Please see Recirculated Section 4.2 and Appendix C-2, for the discussion of cumulative health risks from toxic air contaminants.

I-533.3 This comment is the same as the remaining half of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Sunday, March 5, 2023 1:16 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,20P1n7FlfkWu0AS9F4w93IvLo6aZnavsCbEr_NBZ-5YHok3gtKW3qDFY6LoQIybyb52yCWt28zs5siokLLG3-aipMIG9RAshX_ap1d5rSbHecZo,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,MbMNTb1ASHkdorUeUW8zRFTweF2_RXWHPykpldJlIjBeTmHvbeNyH7Au_y40_9xnHm5soIdKvyrkiNUjO8FzQt0BFb731sAjH2Lyqdy5W4e5pvpxuTP1Cw,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.
Sincerely,
Joseph Aklufi
Riverside, CA 92506

Joe Aklufi
(951)377-4255

Letter I-534

Joe Aklufi
March 5, 2023

I-534.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Sunday, March 5, 2023 1:17 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Joseph Aklufi
Riverside 92506

Joe Aklufi
(951)377-4255

Letter I-535

Joe Aklufi
March 5, 2023

I-535.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Sunday, March 5, 2023 1:17 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Joseph Aklufi
Riverside 92506

Joe Aklufi
(951)377-4255

Letter I-536

Joe Aklufi
March 5, 2023

I-536.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Sunday, March 5, 2023 1:18 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,
Joseph Aklufi
Riverside 92506

Joe Aklufi
(951)377-4255

Letter I-537

Joe Aklufi
March 5, 2023

I-537.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Sunday, March 5, 2023 1:19 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Joseph Aklufi
Riverside 92506

Joe Aklufi
(951)377-4255

Letter I-538

Joe Aklufi
March 5, 2023

I-538.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Sunday, March 5, 2023 1:20 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Joseph Aklufi
Riverside 92506

Joe Aklufi
(951)377-4255

Letter I-539

Joe Aklufi
March 5, 2023

I-539.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Sunday, March 5, 2023 1:21 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Joseph Aklufi
Riverside 92506

Joe Aklufi
(951)377-4255

Letter I-540

Joe Aklufi
March 5, 2023

I-540.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: klzbnorris@aol.com
Sent: Sunday, March 5, 2023 5:42 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. The proposed site sits in the middle of my neighborhood.

I-541.1

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. The Aesthetics section of the draft EIR holds an arbitrary standard of significance.

I have lived very close to the proposed site of this development for 22 years and have spent many hours enjoying the beauty of this open area. It has been a lovely location to walk my dog, my kids rode their bikes there and we even took family photos there. Much of the open space in my community had been overtaken with concrete tilt ups and warehouse space. These developments have drastically increased traffic and noise in our once peaceful and quiet community. This development will only increase this problem. I am deeply concerned about the impact of this development to the aesthetics of my community and the destruction of open space and nature.

I-541.2

I would like to know in what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction.

I-541.3

If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents. The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy.

I-541.3 Cont.

I await your detailed response.

Sincerely,
Lisa Norris
8445 Lindenhurst St.
Riverside, CA 92508

Letter I-541

Lisa Norris
March 5, 2023

I-541.1 & 2 This comment is the first half of Form Letter A – Aesthetics, with the additional statement: "The proposed site sits in the middle of my neighborhood." The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter A Response.

I-541.3 This comment describes personal experience on the Project site and concerns regarding aesthetics impacts from existing development and the Project. The Draft EIR includes a detailed analysis, including photosimulations, evaluating potential impacts associated with aesthetics. As discussed in Section 4.1, Aesthetics, and Topical Response 1 – Aesthetics, the EIR analyzed the potential for implementation of the Project buildout scenario to degrade the existing visual character or quality of public views of the site and its surroundings and concluded impacts would be less than significant. As such, no further response is provided.

I-541.4 This comment is second half of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Mary Harris <mjharris157@hotmail.com>
Sent: Sunday, March 5, 2023 11:09 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Mary Harris
9261 Whiting Way
Riverside,CA. 92508
mjharris157@hotmail.com

Letter I-542

Mary Harris
March 5, 2023

I-542.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Mary Harris <mjharris157@hotmail.com>
Sent: Sunday, March 5, 2023 11:11 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Mary Harris
9261 Whiting Way
Riverside, CA. 92508
mjharris157@hotmail.com

Letter I-543

Mary Harris
March 5, 2023

I-543.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: MJ Rivera <milo.rivera21052@gmail.com>
Sent: Sunday, March 5, 2023 12:04 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Milo Rivera
922 Kilmarnock Way

Riverside, CA. 92508
milo.rivera21052@gmail.com

Letter I-544

Mary Harris
March 5, 2023

I-544.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Melissa Walker <mlbratton@aol.com>
Sent: Sunday, March 5, 2023 9:53 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-545.1

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

I-545.1 Cont.

Please don't surround this beautiful family-oriented community with more warehouses and big rig trucks. Our community of Orangecrest is a community that Riverside should be emulating in other regions of the county, not destroying it with industrial looking warehouses.

As a person who came from Orange County, it was nice to find an area in Riverside that felt safe to raise your children. Don't destroy it. Otherwise it becomes the type of area that hard-working families with kids end up leaving and it just becomes ugly here. There's enough of that in this county.

I-545.2

Sincerely,

Melissa Walker
8351 Vienna Way
Riverside, CA. 92509
mlbratton@aol.com

Letter I-545

Melissa Walker
March 5, 2023

I-545.1 This comment is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-545.2 This comment raises general concerns about and opposition to the proposed Project. The comment does not raise any issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided.

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From: Bob C <rso932@gmail.com>
Sent: Sunday, March 5, 2023 12:05 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

I-546.1

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. My family has lived in our home since February 1999. For the past 2 years we avoid driving the N/B I-215 from Alessandro Blvd. it is absolutely terrible. Our family and friends from the Menifee, Murrieta and Temecula areas attempt to find alternate routes when visiting to avoid the I-215 freeway. Had I known the traffic congestion and pollution would would have been this severe I would have chosen a different area to call home.

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

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How

might the traffic study change if actual (versus the “ideal”) traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area.

I-546.1 Cont.

I have to assume you read newspapers and follow the local news. Numerous cities in the inland empire have put moratoriums on new warehouses or stopped future building altogether. Can’t you learn from other cities mistakes in allowing all these warehouses, along with their concrete footprints, when making decisions of this magnitude? I have to assume you and the other proponents do not reside in the Orangecrest/Mission Grove neighborhoods.

I-546.2

Regards,
Robert Creed
802 Langholm Way
Riverside, Ca. 92508
creedr@prodigy.net

Sent from my iPad

Letter I-546

Robert Creed
March 5, 2023

I-546.1 This comment is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-546.2 This comment references regional moratoriums on warehouse construction. March JPA does not have a moratorium on warehouse construction. The comment does not raise any issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided.

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From: Robert Creed <creedr@prodigy.net>
Sent: Sunday, March 5, 2023 12:13 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you. There are so many warehouses now along the I-215 corridor passing motorists must believe this is a concrete jungle with very little to no family residential areas. This projects an imagine of an area that does not value family residential areas.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Robert Creed
802 Langholm Way
Riverside, Ca 92508
creedr@prodigy.net

Sent from my iPad

Letter I-547

Robert Creed
March 5, 2023

I-547.1 This comment letter is Form Letter A – Aesthetics with the addition of the following: "There are so many warehouses now along the I-215 corridor passing motorists must believe this is a concrete jungle with very little to no family residential areas. This projects an imagine [sic] of an area that does not value family residential areas." These added sentences do not raise any new or different issues than those raise in Form Letter A. As such, in response to this comment, please see Form Letter A Response.

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From: Ryan Joseph <i2yan.joseph@gmail.com>
Sent: Sunday, March 5, 2023 7:20 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,
Ryan Joseph
7128 Foxcroft St., Riverside CA, 92506
i2yan.joseph@gmail.com

Letter I-548

Ryan Joseph
March 5, 2023

I-548.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Ryan Joseph <i2yan.joseph@gmail.com>
Sent: Sunday, March 5, 2023 7:20 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Ryan Joseph
7128 Foxcroft St., Riverside CA, 92506
i2yan.joseph@gmail.com

Letter I-549

Ryan Joseph
March 5, 2023

I-549.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Ryan Joseph <i2yan.joseph@gmail.com>
Sent: Sunday, March 5, 2023 7:20 PM
To: Dan Fairbanks

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional

warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
Ryan Joseph
7128 Foxcroft St., Riverside CA, 92506
i2yan.joseph@gmail.com

Letter I-550

Ryan Joseph
March 5, 2023

I-550.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Ryan Joseph <i2yan.joseph@gmail.com>
Sent: Sunday, March 5, 2023 7:20 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Ryan Joseph
7128 Foxcroft St., Riverside CA, 92506
i2yan.joseph@gmail.com

Letter I-551

Ryan Joseph
March 5, 2023

I-551.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Ryan Joseph <i2yan.joseph@gmail.com>
Sent: Sunday, March 5, 2023 7:20 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Ryan Joseph
7128 Foxcroft St., Riverside CA, 92506
i2yan.joseph@gmail.com

Letter I-552

Ryan Joseph
March 5, 2023

I-552.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Ryan Joseph <i2yan.joseph@gmail.com>
Sent: Sunday, March 5, 2023 7:20 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Ryan Joseph
7128 Foxcroft St., Riverside CA, 92506

i2yan.joseph@gmail.com

Letter I-553

Ryan Joseph
March 5, 2023

I-553.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Ryan Joseph <i2yan.joseph@gmail.com>
Sent: Sunday, March 5, 2023 7:20 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Ryan Joseph
7128 Foxcroft St., Riverside CA, 92506
i2yan.joseph@gmail.com

Letter I-554

Ryan Joseph
March 5, 2023

I-554.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Sara Amend <jnsamend@gmail.com>
Sent: Sunday, March 5, 2023 2:01 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Sara Amend - 92508
jnsamend@gmail.com

Letter I-555

Sara Amend
March 5, 2023

I-555.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Sara Amend <jnsamend@gmail.com>
Sent: Sunday, March 5, 2023 2:02 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Sara Amend
19220 Stagecoach Ln, Riverside, CA 92508
jnsamend@gmail.com

Letter I-556

Sara Amend
March 5, 2023

I-556.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Sara Amend <jnsamend@gmail.com>
Sent: Sunday, March 5, 2023 2:05 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Sara Amend
19220 Stagecoach Ln
Riverside 92508
jnsamend@gmail.com

Letter I-557

Sara Amend
March 5, 2023

I-557.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Sue Nipper <markel221@gmail.com>
Sent: Sunday, March 5, 2023 3:19 PM
To: Dan Fairbanks
Subject: Draft EIR Comment Letter for the Proposed West Campus Upper Plateau
Attachments: DEIR Response Letter - Air Quality.pdf

Dear Mr. Fairbanks,

Attached you will find my comment letter on the Draft EIR for the proposed West Campus Upper Plateau. Thank you for the opportunity to comment. I look forward to receiving a response from you soon. I-558.1

Sincerely,

Susan Nipper
NBC-HWC | Mayo Clinic Certified Wellness Coach
Longtime Orangecrest Homeowner
Longtime Attendee of The Grove Community Church
Member of R-Now (Riverside Neighbors Opposing Warehouses)

19367 Mt Wasatch Dr
Riverside, CA 92508
(909) 238-7669
markel221@gmail.com

March 5, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

I-558.1 Cont.

Re: West Campus Upper Plateau, Environmental Impact Report

Dear Mr. Fairbanks:

As a concerned, longtime resident of Orangecrest, longtime attendee of The Grove Community Church, and a member of R-Now (Riverside Neighbors Opposing Warehouses), I am writing to submit comments on the draft Environmental Impact Report (DEIR) for the proposed West Campus Upper Plateau.

I am also a Mayo Clinic Certified Wellness Coach and a National Board-Certified Health & Wellness Coach. I have serious concerns regarding the proposed project's **significant and unavoidable** (81 locations in the DEIR) impacts on air quality, especially in regard to children and sports teams attending local schools and/or using local parks. "Sensitive receptors" are referred to in twenty-two (22) locations in the DEIR. Sensitive receptors are defined as follows by the California Air Resources Board (ww2.arb.ca.gov):

> *Sensitive receptors* ***are children, elderly, asmatics*** **[*sic*]** ***and others whose*** **[*sic*]** ***are at a heightened risk of negative health outcomes*** *due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. Sensitive Receptor locations may include hospitals, schools, and day care centers, and other such locations as the air district board or California Air Resources Board may determine (California Health and Safety Code 42705.5(a)(5)).*

I-558.2

My specific concerns are regarding these "**sensitive receptors."** I am referring to the young children who attend the preschool at The Grove Community Church as well as the hundreds of children who play sports on the fields at The Grove. The Grove Community Church is one of the closest structures to this project. The project applicant conceded that there will be "**significant and unavoidable**" air quality impacts on surrounding residents. Various mitigations are provided but:

- Who is responsible for monitoring the air quality during construction and operation?
- Who is responsible for following through with these mitigations to be on sure the air our children are breathing is safe?

I-558.3

- Who can parents turn to when their children become sick from the “significant and unavoidable” air quality?

I-558.3 Cont.

Considering the serious impacts and minimal benefit to our neighborhood from the proposed warehouses, I ask the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. Any large warehouses build on this site would cause irreversible harm to our community and especially our children.

I-558.4

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,

Susan Nipper
NBC-HWC | Mayo Clinic Certified Wellness Coach
Longtime Orangecrest Homeowner
Longtime Attendee of The Grove Community Church
Member of R-Now (Riverside Neighbors Opposing Warehouses)

Susan Nipper
19367 Mt Wasatch Dr
Riverside, CA 92508
909-238-7669
markel221@gmail.com

Letter I-558

Susan Nipper
March 5, 2023

I-558.1 This comment is introductory in nature and does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis within the Draft EIR. As such, no further response is provided.

I-558.2 This comment identifies the number of locations in the Draft EIR where there is discussion of the Project's air quality impacts and identification of sensitive receptors. The comment further cites CARB's description of sensitive receptors. Recirculated Section 4.2, Air Quality, analyzes potential health risk impacts to sensitive receptors, including school children. The nearest school is the preschool located at Grove Community Church (Location R8), which was conservatively assumed to be at the Church property line closest to the Specific Plan Area, the maximum incremental cancer risk impact attributable to the Specific Plan without mitigation is calculated to be 0.74 in one million and with mitigation is calculated to be 0.32 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Specific Plan were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Specific Plan would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, and Appendix C-2 for further the discussion of cumulative health risks from toxic air contaminants.

I-558.3 This comment questions who is responsible for enforcement of air quality mitigation measures. As required under CEQA Guidelines Section 15097(a), in order to ensure that mitigation measures and project revisions identified in an EIR are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. As such, and as part of this Final EIR, a Mitigation Monitoring and Reporting Program (MMRP) will be adopted to ensure that all mitigation measures included in the EIR are implemented. While March JPA is currently the lead agency for the Project, the March JPA is expected to relinquish its land use authority in 2025 and the County of Riverside will assume oversight of the Project site. Please see Topical Response 9 – Long-term Project Implementation and Enforcement.

I-558.4 This comment raises general concerns about and opposition to the proposed Project. The comment does not raise any issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided.

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From: Shayn Sowers <shayn.sowers@gmail.com>
Sent: Sunday, March 5, 2023 11:21 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: IMG_8156.MOV

Dear JPA,

I am writing this email to comment on the Draft Environmental Impact Report to the West Campus Upper Plateau. It is a treasured area for residents and a wildlife habitat. I am concerned about the construction of over 4.5 million square feet and how it will displace wildlife. Our open spaces are shrinking, and I do not think the mitigations in your report will adequately preserve the space needed for wildlife to thrive. Furthermore, I believe that the displaced wildlife will then be forced into our neighborhoods and city streets. Please consider how the displacement of wildlife may affect our local neighborhoods. I-559.1

I have attached a video of mountain lion tracks I recently discovered on the trail in the West Campus Upper Plateau. Please do not mar the beauty of this land so that a developer who lives in Upland can make a few more dollars. I-559.2

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old. I-559.3

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

I-559.3 Cont.

Thank you for allowing me to provide comments on this project.

Sincerely,
shayn sowers
951-481-8706

Letter I-559

Shayn Sowers
March 5, 2023

I-559.1 This comment is introductory in nature and expresses general concerns about the loss of habitat, impacts upon biological resources and wildlife displacement. Impacts to biological resources are evaluated and disclosed in Section 4.3, Biological Resources, of the Draft EIR. As part of the proposed Project, a Conservation Easement would be established to permanently maintain open space for the wildlife species in the Project vicinity. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the wildlife habitat values of the Conservation Easement in perpetuity.

Neither the Project site nor any areas in the vicinity of the Project site are within any of the 38 designated MSHCP habitat linkages. Additionally, the analysis within the Draft EIR evaluated the potential impacts upon migration corridors for wildlife species. As discussed in Section 4.3, Biological Resources, the Project site likely serves as a local wildlife corridor between undeveloped areas to the south of the site and the open space areas immediately north of the Project site, north of Alessandro Boulevard, which includes Sycamore Canyon approximately 4,000 feet to the northwest of the site. The Project site also likely serves as a steppingstone corridor for avian species moving through this area, including least Bell's vireo which occur in Meridian Conservation Areas 1 and 2 to the south of the site north and south of Van Buren Boulevard. With full build-out of the Specific Plan Area, an undeveloped corridor would be retained immediately east of the site as part of the Conservation Easement. This undeveloped land would maintain a corridor between site development and nearby residential development, including significant areas of riparian habitat. (Figure 4.3-4 in the Draft EIR). To further buffer the Conservation Easement, the Specific Plan proposes three open space areas, including an additional 30-foot-wide landscaped buffer on the proposed parcels to the north, west, south, and southeast of the Specific Plan Area.

Finally, the Specific Plan Area includes the installation of three wildlife crossings: two under Cactus Avenue in the eastern portion of the Study Area, which will provide additional opportunities for wildlife to safely move north to south through the eastern Conservation Easement corridor; and one beneath Brown Street that will facilitate wildlife movement east and west through the Conservation Easement corridor. The two Cactus Avenue crossings will be soft-bottomed culverts approximately 8 feet in height, 20 feet in width, and 240 feet in length The Brown Street crossing will consist of a soft-bottomed culvert approximately 8 feet in height, 20 feet in width, and 150 feet long. These specifications follow the CBD Settlement Agreement, which prescribed design standards suitable to accommodate local, land-locomotive species (Appendix S of the Draft EIR). Additionally, 60 acres of open space/park is planned for the western portion of the Specific Plan Area that buffers the existing residential uses west of the site, which will be included within the project's General Plan Amendment. This western open space area will still allow for the movement of wildlife to the west of the Specific Plan Area as well. As such, impacts on wildlife corridors would be less than significant.

I-559.2 The comment notes that a video of mountain lion tracks was transmitted and expresses general opposition to the Project. Mountain lions are known to be present in Southern California and occupy undeveloped open spaces. The presence of a mountain lion on the Project site is not considered

unusual. The Project includes a conservation area that will remain as open space in perpetuity, and as such, habitat and linkages with open space will continue to exist for mountain lions and other native species in the Project vicinity. As such, no further response is provided.

I-559.3 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

From: Tia Ballesteros <tiaballesteros13@gmail.com>
Sent: Sunday, March 5, 2023 11:28 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Please listen to the community!

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing

warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Tia Ballesteros
941 Saltcoats Drive
Riverside, CA 92508
Tiaballesteros13@gmail.com

Letter I-560

Tia Ballesteros
March 5, 2023

I-560.1 This comment letter is Form Letter G – Traffic with the addition of: "Please listen to the community!" This addition to the form letter does not raise any new or different issues presented within Form Letter G. As such, in response to this comment, please see Form Letter G Response.

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From: Tia Ballesteros <tiaballesteros13@gmail.com>
Sent: Sunday, March 5, 2023 11:29 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Please listen to the Commmunity!

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Tia Ballesteros
941 Saltcoats Drive
Riverside, CA 92508
Tiaballesteros13@gmail.com

Letter I-561

Tia Ballesteros
March 5, 2023

I-561.1 This comment letter is Form Letter B – Air Quality with the addition of: "Please listen to the Commmunity! [sic]" This addition to the form letter does not raise any new or different issues presented within Form Letter B. As such, in response to this comment, please see Form Letter B Response.

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From: Tia Ballesteros <tiaballesteros13@gmail.com>
Sent: Sunday, March 5, 2023 11:30 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Please hear our voices!

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is

not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Tia Ballesteros
941 Saltcoats Drive
Riverside, CA 92508
Tiaballesteros13@gmail.com

Letter I-562

Tia Ballesteros
March 5, 2023

I-562.1 This comment letter is Form Letter F – Jobs with the addition of: "Please hear our voices!" This addition to the form letter does not raise any new or different issues presented within Form Letter F. As such, in response to this comment, please see Form Letter F Response.

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From: Tia Ballesteros <tiaballesteros13@gmail.com>
Sent: Sunday, March 5, 2023 11:30 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

We are begging you to listen to us!

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Tia Ballesteros
941 Saltcoats Drive
Riverside, CA 92508
Tiaballesteros13@gmail.com

Letter I-563

Tia Ballesteros
March 5, 2023

I-563.1 This comment letter is Form Letter E – Project Consistency with the addition of: "We are begging you to listen to us!" This addition to the form letter does not raise any new or different issues presented within Form Letter E. As such, in response to this comment, please see Form Letter E Response.

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From: Tia Ballesteros <tiaballesteros13@gmail.com>
Sent: Sunday, March 5, 2023 11:32 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Please do not put warehouses in my backyard!

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to

know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Tia Ballesteros
941 Saltcoats Drive
Riverside, CA 92508
Tiaballesteros13@gmail.com

Letter I-564

Tia Ballesteros
March 5, 2023

I-564.1 This comment letter is Form Letter D – Hazards with the addition of: "Please do not put warehouses in my backyard!" This addition to the form letter does not raise any new or different issues presented within Form Letter D. As such, in response to this comment, please see Form Letter D Response.

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From: Tia Ballesteros <tiaballesteros13@gmail.com>
Sent: Sunday, March 5, 2023 11:32 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Tia Ballesteros

941 Saltcoats Drive
Riverside, CA 92508
Tiaballesteros13@gmail.com

Letter I-565

Tia Ballesteros
March 5, 2023

I-565.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Tia Ballesteros <tiaballesteros13@gmail.com>
Sent: Sunday, March 5, 2023 11:33 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Please do not put massive warehouses in my backyard.

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Tia Ballesteros
941 Saltcoats Drive
Riverside, CA 92508
Tiaballesteros13@gmail.com

Letter I-566

Tia Ballesteros
March 5, 2023

I-566.1 This comment letter is Form Letter A – Aesthetics with the addition of: "Please do not put massive warehouses in my backyard." This addition to the form letter does not raise any new or different issues presented within Form Letter A. As such, in response to this comment, please see Form Letter A Response.

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From: Tony Musumba <tonymusumba@gmail.com>
Sent: Sunday, March 5, 2023 2:18 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Anthony Musumba
19798 Allenhurst st
Riverside
CA 92508
tonymusumba@gmail.com

Letter I-567

Anthony Musumba
March 5, 2023

I-567.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Tony Musumba <tonymusumba@gmail.com>
Sent: Sunday, March 5, 2023 2:21 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Anthony Musumba
19798 Allenhurst st
Riverside
CA 92508
tonymusumba@gmail.com

Letter I-568

Anthony Musumba
March 5, 2023

I-568.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Armendina Leyva <armendinaleyva@hotmail.com>
Sent: Monday, March 6, 2023 10:38 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

The health, safety and air quality has been impacted in our community.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
<include name, address, email in signature line> Armendina Leyva
9150 Limecrest Drive
Riverside, California 92508

Sent from my iPad

Letter I-569

Armendina Leyva
March 6, 2023

I-569.1 This comment letter is Form Letter G – Traffic with the addition of: "The health, safety and air quality has been impacted in our community." The modification to the form letter does not raise any new or different issues. As such, in response to this comment, please see Form Letter G Response.

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From: adolfo saldana <adolfosaldana@hotmail.com>
Sent: Monday, March 6, 2023 9:13 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

<include name, address, email in signature line>

Get Outlook for iOS

Letter I-570

Adolfo Saldana
March 6, 2023

I-570.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Beverly Arias <beverly951@yahoo.com>
Sent: Monday, March 6, 2023 9:35 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site? We would ask for significant mitigations to be put in place to reduce the impacts on local residents. 1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing. I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028. I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated.

Who will enforce the mitigations when the March JPA sunsets?

How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Beverly M. Arias
W4 Resident
Casa Blanca

Letter I-571

Beverly Arias
March 6, 2023

I-571.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Beverly Arias <beverly951@yahoo.com>
Sent: Monday, March 6, 2023 9:37 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies? In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan? As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated, "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space d) When

planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred. Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,
Beverly Arias
W4 resident

CasaBlanca Neighborhood

Letter I-572

Beverly Arias
March 6, 2023

I-572.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Beverly Arias <beverly951@yahoo.com>
Sent: Monday, March 6, 2023 9:38 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area. Specifically, I would like to ask: 1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section? 2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project? 3. Why were PFAS and perchlorate omitted in soil testing? 4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis? 5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area. Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers. In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm. The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance. As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Beverly Arias
W4 Resident

CasaBlanca neighborhood

Letter I-573

Beverly Arias
March 6, 2023

I-573.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Beverly Arias <beverly951@yahoo.com>
Sent: Monday, March 6, 2023 9:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Wildlife: 1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB. 2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old. Plant life: 1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life? 2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted. I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Beverly Arias
W4 Resident
CasaBlanca Neighborhood

Letter I-574

Beverly Arias
March 6, 2023

I-574.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Beverly Arias <beverly951@yahoo.com>
Sent: Monday, March 6, 2023 9:41 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents. The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you. The March JPA and the developer have a duty to adhere to the March ARB General Plan and

to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come.
Please don't allow one final grand act of poor land use planning be your lasting legacy.
I await your detailed response.

Sincerely,

Beverly Arias
W4 Resident

CasaBlanca Neighborhood

Letter I-575

Beverly Arias
March 6, 2023

I-575.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Brady Goodson <bgoodson415@gmail.com>
Sent: Monday, March 6, 2023 12:30 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Brady Goodson

20168 Dayton St, Riverside, CA 92508
bgoodson415@gmail.com

Letter I-576

Brady Goodson
March 6, 2023

I-576.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Brady Goodson <bgoodson415@gmail.com>
Sent: Monday, March 6, 2023 12:33 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Brady Goodson

20168 Dayton St, Riverside, CA 92508
bgoodson415@gmail.com

Letter I-577

Brady Goodson
March 6, 2023

I-577.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: christine martin <cmcelsemartin@gmail.com>
Sent: Monday, March 6, 2023 2:06 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

This week as I drove along Alessandro Boulevard near the 215 freeway, I saw warehouses with signage advertising that they are hiring. If the warehouses in the same area as the West Campus Upper Plateau are currently understaffed, how do you expect the new warehouses, offering less than living wages and poor benefits, to find and hire employees? Data shows that the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in

warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Christine M. Celse Martin
5933 Shaker Drive
Riverside, CA 92506
cmcelsemartin@gmail.com

Letter I-578

Christine Martin
March 6, 2023

I-578.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: christine martin <cmcelsemartin@gmail.com>
Sent: Monday, March 6, 2023 2:46 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

I-579.1

Public safety is a significant concern for me. With the increased semi-truck traffic, it will be important for the community driving cars alongside these trucks to be aware the differences in vehicles that might be the cause of serious accidents, e.g. large trucks have larger blind spots than regular vehicles, they are much less maneuverable than regular vehicles and they have longer stopping distances than regular vehicles. What communication campaign will you develop to inform the driving public of these differences that could make the streets hazardous?

I-579.2

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

I-579.3

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

I-579.3 Cont.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Christine M.Clese Martin
5933 Shaker Drive
Riverside, CA 92506
cmcelsemartin@gmail.com

Letter I-579

Christine Martin
March 6, 2023

I-579.1 This comment is the same as the first half of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-579.2 This comment raises concerns of roadway interactions between passenger vehicles and trucks. Section 7 of the California DMV Driver's Handbook details the rules and guidance for passenger vehicles sharing the road with large vehicles such as trucks, which California drivers are required to know. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-579.3 This comment is the same as the second half of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Felicia Valencia <feliciavalencia@msn.com>
Sent: Monday, March 6, 2023 4:59 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,DBwQiImPen9d9nY-1ujiNMBzkXdUygr5oKLx-38P_IRhIIdjwLrLGjLd0QGBzBMhu_DMxa-CDya0wezME-BqK5Sp2CpKEQ_Clz_Yc5GYkdF2asLb1XCmAgADtA,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,K4yvIu_VIJJc5-IBrjDyRacQwbJvv3a1p3joKQJMRPJ2gMOUQDPaJKkHBPvmmN685fHGh12nKy5o4Ni41T2ddDXxsiNB4boJmLYOs9y1kyT3&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Felix and Felicia Valencia
Residents of Orangecrest, 92508

Felicia Valencia

Letter I-580

Felix & Felicia Valencia
March 6, 2023

I-580.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Felicia Valencia <feliciavalencia@msn.com>
Sent: Monday, March 6, 2023 5:04 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Felix and Felicia Valencia
19706 Krameria Ave.
Riverside, CA 92508

Letter I-581

Felix & Felicia Valencia
March 6, 2023

I-581.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Felicia Valencia <feliciavalencia@msn.com>
Sent: Monday, March 6, 2023 5:07 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Felix and Felicia Valencia
Felixv25@msn.com, FeliciaValencia@msn.com
19706 Krameria Ave
Riverside, CA 92508

Letter I-582

Felix & Felicia Valencia
March 6, 2023

I-582.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Felicia Valencia <feliciavalencia@msn.com>
Sent: Monday, March 6, 2023 5:08 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Felix and Felicia Valencia
Felixv25@msn.com, FeliciaValencia@msn.com
19706 Krameria Ave
Riverside, CA 92508

Letter I-583

Felix & Felicia Valencia
March 6, 2023

I-583.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Felicia Valencia <feliciavalencia@msn.com>
Sent: Monday, March 6, 2023 5:09 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Felix and Felicia Valencia

Felixv25@msn.com, FeliciaValencia@msn.com
19706 Krameria Ave
Riverside, CA 92508

Letter I-584

Felix & Felicia Valencia
March 6, 2023

I-584.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Felicia Valencia <feliciavalencia@msn.com>
Sent: Monday, March 6, 2023 5:10 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Felix and Felicia Valencia
Felixv25@msn.com, FeliciaValencia@msn.com
19706 Krameria Ave
Riverside, CA 92508

Letter I-585

Felix & Felicia Valencia
March 6, 2023

I-585.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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Letter I-586

[NOT USED]

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From: J Gonsman <teamgonsman@yahoo.com>
Sent: Monday, March 6, 2023 12:11 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Ok Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Wildlife: 1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB. 2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old. Plant life: 1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life? 2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted. I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced? Thank you for allowing me to provide comments on this project.
Sincerely,

Jason Gonsman
20232 Dayton Street, Riverside 92508
Teamgonsman@yahoo.com

Letter I-587

Jason Gonsman
March 6, 2023

I-587.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: J Gonsman <teamgonsman@yahoo.com>
Sent: Monday, March 6, 2023 12:17 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area. Specifically, I would like to ask: 1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section? 2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project? 3. Why were PFAS and perchlorate omitted in soil testing? 4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis? 5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area. Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers. In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm. The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance. As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed Thank you for allowing me to provide comments on this project.

Jason Gonsman
20232 Dayton Street Riverside 92508
Teamgonsman@yahoo.com

Letter I-588

Jason Gonsman
March 6, 2023

I-588.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: J Gonsman <teamgonsman@yahoo.com>
Sent: Monday, March 6, 2023 12:19 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Jason Gonsman
20232 Dayton Street riverside 92508
Teamgonsman@yahoo.com

Letter I-589

Jason Gonsman
March 6, 2023

I-589.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: KEN RENNE <kenrenne@aol.com>
Sent: Monday, March 6, 2023 1:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Ken Renne
8831 Mesa Oak Drive
Riverside, CA 92508

Letter I-590

Ken Renne
March 6, 2023

I-590.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Leo Bobadilla <leoboba7@gmail.com>
Sent: Monday, March 6, 2023 7:55 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Leo Bobadilla
<include name, address, email in signature line>
8306 Laurel Ridge Road Riverside 92508

Sent from my iPhone

Letter I-591

Leo Bobaldilla
March 6, 2023

I-591.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Larry Iest <iestlarry@gmail.com>
Sent: Monday, March 6, 2023 7:17 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Larry Iest
8149 Faircrest Rd, Riverside, CA 92508
iestlarry@gmail.com

Letter I-592

Larry Iest
March 6, 2023

I-592.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Lenora Mitchell <rageturner@gmail.com>
Sent: Monday, March 6, 2023 10:04 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau DEIR

3/6/2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA) 14205 Meridian Parkway, Suite 140 Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-593.1

In addition, by failing to address the negative impact on senior citizens, this proposed warehouse development is discriminatory.
I am 70 years old and live in the Camino del Sol area off of Alessandro, near the future warehouse development in Sycamore Canyon(in effect, surrounded by proposed warehouses). Westmont Village is a retirement community on Arnold Drive in Orangecrest. Both areas are already experiencing an extremely large increase in truck traffic.
The Project would negatively lead to further social isolation for seniors through decreased confidence in driving on local streets by being surrounded and blocked by large diesel trucks.
The National Library of Medicine reports "Driving plays a vital role in older adults' maintaining their preferred ways of life and is an important component of self-autonomy and independence." "However, many older adults eventually cease driving due to medical conditions, functional impairments, and decreased confidence in driving. Driving cessation has also been linked to poor physical performance and functioning, elevated depressive symptoms and reduced engagement in social activities." I-593.2

Kaiser Medical has doctors offices, lab and x-ray services on Meridian Parkway only 1000 ft from the proposed Project entry on Cactus. My doctors office is located there and it is obvious that many seniors receive treatment at this facility. Increased truck traffic will surely make doctors visits more problematic for seniors and could result in hesitation in seeking healthcare that the increase in stress, depression and air pollution would necessitate. Older adults are especially vulnerable to harm from climate change brought on by declining air quality. I-593.3

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to "upzone" the land use as specified in the General Plan from Business Park to industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and I-593.4

commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan,Draft General Plan, and Community Preference land use. Therefore I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial,business park,mixed-use) as being incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-593.4 Cont.

Thank you for letting me comment on your project.

Sincerely,

Lenora Mitchell
14170 Vista Grande Dr.
Riverside, CA 92508
rageturner@gmail.com

Letter I-593

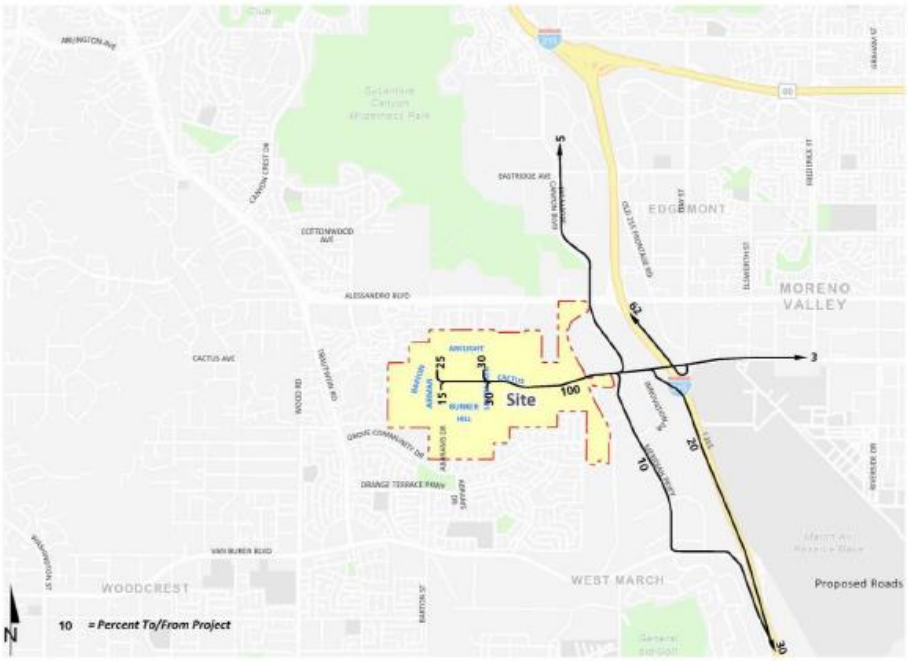
Lenora Mitchell
March 6, 2023

I-593.1 This comment is the first paragraph of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-593.2 This comment states that the increase in truck traffic leads to social isolation for senior citizens through decreased confidence in driving on local streets. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-593.3 This comment raises additional concerns regarding truck traffic in the vicinity of the Kaiser Medical offices located near the Project site. In response to this comment, please see Response to Comment I-593.2 above. Exhibit 4-1 of the Project Traffic Analysis (Appendix N-2) identified approximately 5% of the Project trucks utilizing the segment of Cactus Avenue identified in the comment. Approximately 85% of Project trucks are projected to remain on Cactus Avenue through its intersection with Meridian Parkway because the Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, beyond Meridian Parkway.

EXHIBIT 4-1: PROJECT (TRUCK) TRIP DISTRIBUTION



Recirculated Section 4.2, Air Quality, and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human

health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, and Appendix C-2 for further the discussion of cumulative health risks from toxic air contaminants.

I-593.4 This comment is the remainder of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Monday, March 6, 2023 7:52 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,BG3btfhCNAdo9fntBlhpj_qBAdCTGW95T7i3thRPFgF5OT8CK4EQo5afLFjuX4wn6QBR3io_7xGZ7D-tViKeYqL-vZFpXZqt9UMJf1sPnqkkGvpUlX0GMSeBJyQ,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone

(https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,Qtb8IclDIA0r0a--ea3WIMozEgMcwRr57wxnYcXphIgh4_Mdb6i44AbsQHM6O6DbXYFyFii8Lg5KJUXNmJQLzanLcIqUiGM9s8VxsGD6&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
Linda K. Tingleyrivera
<include name, address, email in signature line>
922 Kilmarnock Way, Riverside 92508
Linda. Tingley@yahoo.com
Sent from my iPhone

Letter I-594

Linda Tingley
March 6, 2023

I-594.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: MJ Rivera <milo.rivera21052@gmail.com>
Sent: Monday, March 6, 2023 1:07 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Milo Rivera
922 Kilmarnock Way
Riverside, CA. 92508
milo.rivera21052@gmail.com

Letter I-595

Milo Rivera
March 6, 2023

I-595.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Maria Rodriguez <mariarod0421@gmail.com>
Sent: Monday, March 6, 2023 4:35 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

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If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

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Sincerely,

Milo Rivera
922 Kilmarnock Way
Riverside, CA. 92508
milo.rivera21052@gmail.com

Letter I-596

Maria Rodriguez
March 6, 2023

I-596.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Maria Rodriguez <mariarod0421@gmail.com>
Sent: Monday, March 6, 2023 4:41 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Maria R
92508

Letter I-597

Maria Rodriguez
March 6, 2023

I-597.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Maria Rodriguez <mariarod0421@gmail.com>
Sent: Monday, March 6, 2023 4:43 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Maria R
92508

Letter I-598

Maria Rodriguez
March 6, 2023

I-598.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Maria Rodriguez <mariarod0421@gmail.com>
Sent: Monday, March 6, 2023 4:43 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Maria R

92508

Letter I-599

Maria Rodriguez
March 6, 2023

I-599.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: CHRISTINE MARTIN <timnchrismartin@aol.com>
Sent: Monday, March 6, 2023 1:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

I-600.1

Currently, minimum wage does not provide enough income for parents to support a family while meeting housing costs. Additionally, more and more older workers desire and need health insurance for themselves and their families. Whether or not this is standard for the industry is irrelevant as your ability to create an adequate employee pool is foundational for this proposal.

Please specifically address how you will provide incentives for prospective employees in terms of a total compensation package that will be attractive to those looking for employment in the region.

I-600.2

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

I-600.3

Sincerely,

Tim Martin
timnchrismartin@aol.com
5933 Shaker Dr. Riverside, CA 92506

Letter I-600

Tim Martin
March 6, 2023

I-600.1 This comment is the first half of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

I-600.2 This comment discusses minimum wage, housing costs, the need for health insurance coverage, and requests that the EIR specifically address how incentives will be provided for prospective employees in terms of a total compensation package that will be attractive to those looking for employment in the region. The inclusion of economic conditions such as those raised by the commenter fall outside the scope of CEQA and are not related to the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-600.3 This comment is the second half of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: CHRISTINE MARTIN <timnchrismartin@aol.com>
Sent: Monday, March 6, 2023 2:30 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

I-601.1

There are nearly 10,000 students who attend school in the areas most impacted by truck traffic. Please detail prescriptive efforts that will be made to ensure the safety of our students with the increase in truck traffic that will result from developing the West Campus Upper Plateau Project.

I-601.2

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How

I-601.3

might the traffic study change if actual (versus the “ideal”) traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

I-601.3 Cont.

Sincerely,

Tim Martin
timnchrismartin@aol.com
5933 Shaker Dr. Riverside, CA. 92506

Letter I-601

Tim Martin
March 6, 2023

I-601.1 This comment is the first half of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-601.2 This comment raises concerns about truck traffic and school traffic. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway. Exhibit 4-1 of the Project Traffic Analysis (Appendix N-2) shows the anticipated truck distribution. There are no schools along the routes 97% of the Project's trucks would use. There are schools in the vicinity of the City of Moreno Valley's truck routes, but only three percent of truck trips (approximately 62 trips) would continue east along Cactus Avenue.

Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-601.3 This comment is the second half of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: christine martin <cmcelsemartin@gmail.com>
Sent: Tuesday, March 7, 2023 8:11 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

I-602.1

The "State of the Air" 2022 report found that despite decades of progress on cleaning up sources of air pollution, more than 40% of Americans - over 137 million people - are living in places with failing grades for unhealthy levels of particle pollution or ozone. The terrible reality that the proposed warehouses will increase pollution and unhealthy living for the people in the Orangecrest neighborhood as well as throughout the extended community takes us steps in the wrong direction. I am extremely concerned about the degradation of the air we breathe. What will you do to mitigate the adverse impact of increased pollution on the health and well-being of neighbors of the proposed warehouses?

I-602.2

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

I-602.3

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I-602.3 Cont.

Thank you for the opportunity to comment.

Sincerely,

Christine M.Clese Martin
5933 Shaker Drive
Riverside, CA 92506
cmcelsemartin@gmail.com

Letter I-602

Christine Martin
March 7, 2023

I-602.1 This comment is the first half of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-602.2 This comment expresses concern about exposing residents to increased air pollution and asks what will be done to mitigate impacts from the proposed Project. In response to this comment, please see Recirculated Section 4.2, Air Quality, where the impact analysis for air quality is included, as well as mitigation measures intended to reduce air impacts to surrounding residents. Please see Recirculated Section 4.2, Air Quality, for a discussion of the additional feasible air quality mitigation measures that have been added to the Project.

I-602.3 This comment is the second half of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Gayle Dicarlantonio <gayledmail@gmail.com>
Sent: Tuesday, March 7, 2023 11:37 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

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1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Gayle DiCarlantonio
Riverside 92507
gayledmail@gmail.com

Letter I-603

Gayle DiCarlantonio
March 7, 2023

I-603.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Jeremy Goldman <jagoldman@gmail.com>
Sent: Tuesday, March 7, 2023 1:19 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: JAG DEIR COMMENTS.pdf

Mr. Fairbanks,

Please find attached my comments on the DEIR for the West Campus Upper Plateau.

Thank you for the opportunity to submit them into the record. Please confirm receipt.

Regards,

I-604.1

Jeremy Goldman
8254 Lavender Lane
Riverside, CA 92508

March 7, 2023

Mr. Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Mr. Fairbanks:

Please find attached my official comments on the draft environmental impact report for the Meridian West Campus – Upper Plateau.

Thank you for the opportunity to submit.

Regards,

Jeremy Goldman
8254 Lavender Lane
Riverside, CA 92508
JAGOLDMAN@GMAIL.COM

I-604.1
Cont.

Aesthetics:

I do not agree that the potentially significant aesthetic impacts during construction will be mitigated by MM AES 1. Please provide site specific locations of where construction equipment will be stored and provide visual simulations and line of site studies from adjacent properties that illustrate that these areas will not have significant impacts on the community. I-604.2

The DEIR needs to include an exterior point by point photometric study at this time and not defer it to prior the issuance of building permit stage to ensure that these impacts are not significant. The public will have no ability to review and provide input if the studies are done after the project is approved. I-604.3

The Project needs to commit to installing solar photovoltaic systems on all buildings prior to approval of the Project and not defer to a future date after the Project is approved. I-604.4

Air Quality

I do not agree that air quality impacts will be less than significant during construction. The DEIR does not include any mitigation measures to minimize or reduce project impacts during construction. The 15 mitigation measures that are included for air quality are standard requirements and will do little to minimize air quality impacts resulting from this Project. I-604.5

Biology I-604.6

No Comments

Cultural Resources I-604.7

No Comments

Energy

I do not agree that energy impacts are less than significant given that the DEIR defers the commitment of solar photovoltaic systems to after project approval. The DEIR needs to incorporate specific mitigation measures for energy impacts and not use AQ and GHG measures to mitigate these potentially significant impacts. I-604.8

Geology and Soils I-604.9

No Comments

Greenhouse Gas Emissions

I do not agree that GHG impacts will be less than significant. MM-GHG 1 requires a commitment of 30% photovoltaic energy generation, however there is no guarantee that photovoltaic solar will be approved by the ALUC and the March JPA. There should be a commitment at this time that the Project will install photovoltaic systems for each building that provides 100% of the project's energy needs, not 30%. What does MM-GHG-11 have to do with greenhouse gas mitigation and why provide the Applicant 7 years to construct the bus shelter? I-604.10

Hazards and Hazardous Materials

I do not agree that this potentially significant impact will be mitigated through the 3 mitigation measures that are included in the DEIR. There should be additional mitigation measures that are included that provide the community with status reports to ensure no contaminants leave the site during project construction and/or operations. I-604.11

Hydrology and Water Quality

MM-HYD-2 requires that a WQMP be prepared prior the issuance of each building permit. There should be a project wide WQMP prepared as part of the DEIR that future buildings need to adhere to. If not, the potential exists for fragmented water quality system that has the potential to impact adjacent properties and neighborhoods. I-604.12

Land Use and Planning

The DEIR needs to include specific mitigation measures for this potential impact and not merely reference other mitigation measures. I-604.13

NOISE

I do not agree that noise impacts will be less than significant during construction. Addtionally, the DEIR fails to include even one mitigation measure to lessen noise impacts during construction or operation. The DEIR needs to be revised to include a noise study that analyzes potential noise impacts and includes effective mitigation measures to lessen noise. I-604.14

Population and Housing

The DEIR states that this section is Not Applicable for this Project. Again, the DEIR needs to be revised to address the development of this Project and it's impacts on Population and Housing in the area. I-604.15

Public Services

The DEIR states that these impacts are Not Applicable and includes 1 mitigation measure for Fire. The DEIR needs to be revised to provide a complete analysis of the impacts this project will have on public services and provide mitigation measures that lessen any significant impacts. I-604.16

Recreation

The DEIR states that impacts to recreation are Not Applicable and simply refers to a myriad of mitigation measures in other sections. The DEIR needs to be revised to provide a complete analysis of the impacts this project will have on recreation and provide mitigation measures that lessen any significant impacts. I-604.17

Transportation

The DEIR concludes that Transportation impacts will be less than significant. This finding is **ludicrous** given existing transportation patterns within the area. The DEIR includes two mitigation measures, one requires a construction traffic management plan and the other requires a traffic safety plan for Barton Street. Both measures need to be performed at this time and included in the DEIR. It is inconceivable to defer these essential studies to a future milestone. I-604.18

There is no way that additional traffic from this Project can be accommodated within Barton Street and Grove Community Drive. The existing street pattern was not planned for industrial traffic generated by the Project. At all times of the year, thousands of people use Grove Community Church and Orange Terrace Community Park for sporting activities. There should be no connection from this Project from Barton Street to Grove Community Drive. I-604.19

Please provide detailed list of all freeway improvements (215 and 60) planned for this project. I-604.20

Tribal Cultural Resources I-604.21

No Comments

Utilities and Service Systems

The DEIR states that impacts to these systems are Not Applicable. The DEIR needs to be revised to include a complete discussion of potential impacts and provide specific mitigation measures. I-604.22

FIRE

The DEIR concludes that Fire impacts are less than significant and includes 3 mitigation measures, none of which include the funding or construction of a new fire station or any supplemental funding for increased fire personnel. There is no way that the RCFD can provide adequate I-604.23

coverage for the proposed project without additional facilities and manpower, both of which should be provided by this project.

I-604.23 Cont.

ALTERNATIVES

The DEIR needs to include residential alternative for the project site on all or portions of the site. Any of the other 4 alternatives are superior to what is being proposed.

I-604.24

Letter I-604

Jeremy Goldman
March 7, 2023

I-604.1 This comment is introductory in nature and does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis within the Draft EIR. As such, no further response is provided.

I-604.2 This comment questions the effectiveness of MM-AES-1 to reduce the Project's aesthetics impacts during construction. Regarding MM-AES-1, CEQA Guidelines Section 15126.4(a)(1)(B) states in part that the specific details of a mitigation measure "may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review, provided the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve the performance standard that will be considered, analyzed, and potentially incorporated in the mitigation measure." As detailed in Section 4.1, Aesthetics, of the Draft EIR, MM-AES-1 (Construction Equipment Staging and Screening) requires the staging of large construction equipment and vehicles outside of the public viewshed when not in use – the performance standard. MM-AES-1 would achieve this standard by concealing staging areas with existing intervening topographical or natural features. If not possible, then staging areas shall be concealed by fence screening and/or berming. Any fencing used shall incorporate vinyl tarps or slatted chain links to screen potential views of construction equipment. Inclusion of MM-AES-1 in the Project's MMRP would commit March JPA to the mitigation. As such, MM-AES-1 complies with CEQA Guidelines Section 15126.4(a)(1)(B) and would be effective in reducing the Project's aesthetic impacts during construction to public vantage points to less than significant levels.

In addition, the comment requests specific locations on the Project site where construction equipment would be stored and visual simulations from adjacent properties to illustrate the potential effects. The comment's request is too speculative to fulfill due to the dynamic changes that would occur during various construction phases and the phases of the Specific Plan's implementation. According to CEQA Guidelines Section 15204(a), "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR." "A project opponent… can always imagine some additional study or analysis that might provide helpful information, [but] [i]t is not for them to design the EIR [and the fact] [t]hat further study… might be helpful does not make it necessary." *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 415.

I-604.3 This comment requests the implementation of MM-AES-2 (Exterior Lighting Point-by-point Photometric Study Approval) during the preparation of the Final EIR instead of prior to the issuance of a building permit. Similar to Response I-604.2, above, the request is too speculative to be implemented at this time given that future buildings constructed under the Specific Plan are not proposed at this time (with the exception of Buildings B and C). MM-AES-2 is drafted in accordance with Section 15126.4(a)(1)(B) of the State CEQA Guidelines, as March JPA commits itself to require each building permit to submit a photometric study with specific performance standards: Compliance with the March JPA Development Code, the proposed Specific Plan, and the 16 project design features related lighting and glare, as detailed in Section 4.1, Aesthetics, of the Draft EIR.

I-604.4 This comment contends the Draft EIR defers solar commitment to a later date. Under revised MM-GHG-1, the applicant will install rooftop solar photovoltaic systems for each building sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside ALUC. Because of the Project site's proximity to the March ARB, MM-AES-3 requires the applicant to submit a glint and glare study and the system's design for Riverside ALUC and March ARB review and approval. Similar to Response I-604.2, MM-GHG-1 and MM-AES-3 do not constitute deferred mitigation and are in compliance with CEQA Guidelines Section 15126.4(a)(1)(B).

I-604.5 This comment generally objects to the conclusions in the Draft EIR regarding construction-related air quality impacts. The comment further states the proposed mitigation measures are standard requirements and would not reduce impacts related to air quality. Recirculated Section 4.2, Air Quality, disclosed and analyzed construction-related air quality impacts. As shown in Table 4.2-7, the Project's unmitigated construction emissions would exceed the SCAQMD construction significance threshold for VOCs and NO_x. MM-AQ-1 requires offroad equipment used during construction meet CARB Tier 4 Final emissions standards or better. To ensure the Project's construction activities proceed within the assumptions utilized in the Project's Revised Air Quality Impact Analysis (Appendix C-1), MM-AQ-2 requires the construction contractor to submit biweekly logs to March JPA detailing construction equipment hours and acreage graded. MM-AQ-3 (Construction Best Practices) would reduce construction-source emissions. MM-AQ-4 requires the use of "Super-Compliant" low VOC paints which have been reformulated to reduce VOC emissions so that the regulatory VOC limits put forth by SCAQMD's Rule 1113 are not exceeded or, in the alternative, tilt-up concrete buildings that do not require the use of architectural coatings. The proposed mitigation is feasible, consistent with SCAQMD Rule 1113, and measurable, as shown in Table 4.2-12, which demonstrates the Project's mitigated construction emissions would be below SCAQMD's construction significance thresholds for all criteria air pollutant emissions.

I-604.6 The commenter indicates that they have no comments on the biology section of the Draft EIR. As such, no further response is required.

I-604.7 The commenter indicates that they have no comments on the cultural resources section of the Draft EIR. As such, no further response is required.

I-604.8 This comment generally objects to the Draft EIR's determination on energy impacts asserting the Project defers a commitment to solar photovoltaic systems to after approval. In response to this comment, see Response I-604.4 for discussion on the Project's commitment to solar photovoltaic systems. The comment further disagrees with the use of air quality and GHG mitigation measures to address energy impacts. Mitigation measures can lessen a project's impacts across multiple topic areas. Section 4.5, Energy, of the Draft EIR determined the Project's energy impacts to be less than significant and no mitigation would be required. Although not required, the Draft EIR then discloses that PDF-AQ-1, MM-AQ-21 and MM-GHG-1 through MM-GHG-12 would further reduce the Project's energy usage and impacts. Additionally, MM-AQ-7 (Passive Heating, Cooling, and Natural Light), MM-AQ-13 (Electrical Service for Landscaping Equipment), MM-AQ-14 (Electrical or Battery-Operated Landscaping Equipment), MM-AQ-18 (Electrical On-Site Equipment), MM-AQ-20 (Clean Fleet Trucks, Vans and Vehicles), and MM-AQ-11 (Clean Fleet Electric Supply) are incorporated into the Project and would also reduce the Project's energy usage.

I-604.9 This commenter indicates that they have no comments on the geology and soils section of the Draft EIR. As such, no further response is required.

I-604.10 This comment objects to the Draft EIR's determination on greenhouse gas impacts asserting the Project defers a commitment to rooftop solar photovoltaic systems until after approval through MM-GHG-1. In response to this comment, see Response I-604.4, above, for discussion on the Project's commitment to solar photovoltaic systems.

The comment questions the effectiveness of MM-GHG-11 to reduce the Project's GHG impacts and its 7-year timeframe. MM-GHG-11 would require, prior to the issuance of any grading permit, the applicant to pay $17,000 to March JPA for the installation of a bus shelter on Alessandro Boulevard. Installation of the bus shelter would improve the local public transit network and further encourage the use of alternative forms of transportation. Increased public transit usage along Alessandro Boulevard would result in reduced GHG emissions in the Project vicinity. In-lieu fee payments are consistent with the constitutional requirements, as detailed in Section 15126.4(a)(4) of the State CEQA Guidelines, including an essential nexus between the mitigation and a legitimate government interest (*Nollan v. California Coastal Commission*, 483 U.S. 825 (1987). Under MM-GHG-11, March JPA is responsible for the installation of the bus shelter. Only if the bus shelter has not been installed within seven years of Project approval would the funds be refunded to the applicant.

I-604.11 This comment generally questions the effectiveness of MM-HAZ-1 through MM-HAZ-3 to reduce impacts related to hazards and hazardous materials. Recirculated Section 4.8, Hazards and Hazardous Materials, analyzed the Project's construction and operational impacts and determined potentially significant impacts could occur. MM-HAZ-1 would require the abatement of hazardous building materials by implementing the recommendations of the Phase II Environmental Site Assessment (Appendix J-2). MM-HAZ-2 would prohibit toxic or highly toxic gases at quantities that exceed California Health and Safety Code Section 25532 threshold levels from being stored, handled, or used within one-quarter mile of an existing school. MM-HAZ-3 would implement airport compatibility measures prior to the issuance of building permits within the Specific Plan Area. MM-FIRE-1 would require implementation of vegetation management at the start of and throughout all phases of construction, and combustible materials would not be brought on site until site improvements (e.g., utilities, access roads, fire hydrants, fuel modification zones) have been implemented and approved by RCFD. Out of an abundance of caution, the Campus Development would be required to comply with all provisions in the Riverside County Code regulating development in a HFHSZ. With implementation of these mitigation measures, all hazards and hazardous materials impacts associated with the proposed Project would be less than significant.

The comment requests additional mitigation measures in the form of community status reports "to ensure no contaminants leave the Project site during construction and operation." As discussed above, Recirculated Section 4.8, Hazards and Hazardous Materials, determined the Project would have less than significant hazards and hazardous materials impacts with mitigation incorporated; additional mitigation is not required. Additionally, the proposed mitigation measure would not reduce the Project's hazards and hazardous materials impacts.

I-604.12 This comment asserts a Project-wide WQMP should be prepared and that MM-HYD-2 would result in inconsistencies in the Project site's water quality system. Appendix K-2 of the Draft EIR is the Master Project Specific Water Quality Management Plan, the Project-wide WQMP. As further detailed in Section

4.9, Hydrology and Water Quality, of the Draft EIR, MM-HYD-2 would require the development of future WQMPs prior to the issuance of each building permit within the Specific Plan Area be consistent with the Master Project Specific Water Quality Management Plan. Moreover, this measure would ensure compliance with the requirements of the Riverside County Municipal Separate Storm Sewer System (MS4) Permit, as well as the National Pollutant Discharge Elimination System (NPDES) New Development & Redevelopment Guidelines for Projects Under the March Joint Powers Authority, also known as the 2008 March JPA WQMP Guidance Document. In addition, a long-term maintenance and funding plan would also be approved by the March JPA as part of each WQMP, thereby ensuring consistency for future development under the Specific Plan.

I-604.13 This comment requests specific mitigation measures to reduce impacts related to land use and planning. Recirculated Section 4.10, Land Use and Planning, incorporates mitigation measures identified in other sections of the Draft EIR to demonstrate consistency with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. See Response I-604.8 related to the use of mitigation measures across multiple sections of the Draft EIR.

I-604.14 This comment objects to the Draft EIR's determination related to construction noise and absence of mitigation measures. The comment requests a noise study to analyze noise impacts and include effective mitigation measures. Appendix M-1 is a Noise and Vibration Impact Analysis (Appendix M-1) prepared by Urban Crossroads in October 2022 and revised in December 2023. Based on the findings of the noise study, the EIR determined the Project would result in less than significant construction noise impacts. As detailed further in Section 4.11, Noise, of the Draft EIR, the impact analysis is based on quantifiable thresholds and relies on existing regulations to reduce impacts. The Project includes PDF-NOI-1 through PDF-NOI-3, which would limit the hours of construction and blasting and drilling activities. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Mitigation is required when there is a potentially significant environmental impact. The Project would have less than significant impacts due to construction noise and no mitigation is required. With regard to on-site operational noise, the Draft EIR determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant. Section 4.11, Noise, of the Draft EIR evaluated the mitigation potential of rubberized asphalt but determined such a measure would not lower off-site traffic noise levels below the level of significance for Roadway Segment #13, so the Project's noise impacts for Roadway Segment #13 is significant and unavoidable. No changes or revisions to the Draft EIR are required in response to this comment.

I-604.15 This comment suggests impacts related to population and housing were not evaluated in the Draft EIR. Section 4.12, Population and Housing, evaluates the Project's potential to induce substantial unplanned population growth and determined the Project's impacts to be less than significant. The Draft EIR determined the Project would not displace substantial numbers of existing people or housing through the analysis provided in the Initial Study. For details regarding this threshold, refer to Chapter 5, Other CEQA Considerations, and the Initial Study included as Appendix A of the Draft EIR. No changes or revisions to the Draft EIR are required in response to this comment.

I-604.16 This comment suggests impacts related to public services were not evaluated in the Draft EIR. Section 4.13, Public Services, analyzed potential impacts related to public services, including fire protection, police protection, schools, parks, and other public facilities. The Draft EIR determined impacts to fire protection services would be less than significant and identified that MM-FIRE-1 would further reduce impacts related to fire protection services. Impacts for other public services (i.e., police, schools, parks, etc.) were found to be less than significant due to proximity to existing services, funding sources, and design considerations. No changes or revisions to the Draft EIR are required in response to this comment.

I-604.17 This comment suggests impacts related to recreation were not evaluated in the Draft EIR. Section 4.14, Recreation, analyzed potential impacts related to recreation and determined the Project's impacts to be less than significant and no mitigation was required. Section 4.14.5 identified a list of mitigation measures that would be applicable to the construction and operation of the proposed Park. No changes or revisions to the Draft EIR are required in response to this comment.

I-604.18 This comment objects to the impact determination within Section 4.15, Transportation, due to existing area transportation patterns. Traffic delay and Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine transportation impact and mitigation measures for CEQA.

The comment suggests MM-TRA-1 (Construction Traffic Management Plan) and MM-TRA-2 (Traffic Safety Plan for Barton Street) are deferred and should be implemented prior to Project approval. CEQA Guidelines Section 15126.4(a)(1)(B) states in part that the specific details of a mitigation measure "may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review, provided the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve the performance standard that will be considered, analyzed, and potentially incorporated in the mitigation measure." It would be impracticable to develop a construction traffic management plan at this time as the specific details of coordination for Project construction are not yet determined; MM-TRA-1 commits the March JPA to implement the mitigation, sets forth the performance standard and actions that would be potentially incorporated into the final plan. It is infeasible to develop the Barton Street traffic safety plan at this time because the ultimate plan for the proposed Park has not been determined; MM-TRA-2 commits the March JPA to implement the mitigation, sets forth the performance standard and actions that would be potentially incorporated into the final plan. No changes or revisions to the Draft EIR are required in response to this comment.

I-604.19 This comment asserts additional industrial traffic cannot be accommodated within Barton Street and Grove Community Drive. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become

accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-604.20 This comment requests a detailed list of all freeway improvements planned for the proposed Project. A queuing analysis at freeway off-ramps is included in Section 4.15, Transportation, and shows acceptable stacking distance for the Project (Table 4.15-7). PDF-TRA-4 requires the payment of fair share cost towards improvements at off-site intersections. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. These improvements are listed in Table 1-4, Summary of Improvements and Rough Order of Magnitude Costs, of Appendix N-2 of the Draft EIR. For the I-215 ramps:

- I-215 NB Ramps and Alessandro Boulevard – Project would pay its fair share ($16,926) to add a NB 2nd left turn lane
- I-215 SB Ramps and Cactus Avenue – Project would pay TUMF fees to contribute towards adding an EB 3rd through lane and a WB 3rd through lane
- I-215 NB Ramps and Cactus Avenue – Project would pay TUMF fees to contribute towards adding a NB 2nd left turn lane, EB right turn lane, WB 3rd through lane, EB 3rd through lane and WB 4th through lane
- I-215 SB Ramps and Van Buren Boulevard – Project would pay its fair share ($3,925) to restripe SB through as a left lane and modify EB right turn lane to single free right turn lane. Project would also pay TUMF fees to contribute towards adding a WB 3rd through lane

I-604.21 This commenter indicates that they have no comments on Section 4.16, Tribal Cultural Resources, of the Draft EIR. As such, no further response is required.

I-604.22 This comment suggests impacts related to utilities and service systems were not evaluated in the Draft EIR. Section 4.17, Utilities and Service Systems, analyzed utilities, including water, wastewater, storm water, electric power, natural gas, telecommunications and solid waste, determining impacts to be less than significant and no mitigation required. See Section 4.17 for more discussion on utilities. No changes or revisions to the Draft EIR are required in response to this comment.

I-604.23 The comment raises concern for fire protection services without the construction of a new fire station or funding for increased fire personnel. The Project Development Agreement includes the construction of the planned County fire station to be located at the northeast corner of Meridian Parkway and Opportunity Way. See Topical Response 6 - Meridian Fire Station for additional details. No changes or revisions to the Draft EIR are required in response to this comment.

I-604.24 The comment requests a residential alternative for the Project site. In addition, the comment expresses support for any of the other four alternatives to the proposed Project. In response to this comment, please see Topical Response 8 – Alternatives.

From: jenna pontious <jennapbird@icloud.com>
Sent: Tuesday, March 7, 2023 12:03 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,aZDw5nQ5ppZN12IG2hEbL-cxfO59D94IMAq-VslCVKD3gIJ2EuWMdgYFlIFjdqR3mHx9qZ-ZzM0WoRItz2PsJ3Rl3VpPllJI8gn71xl0Zm1XEh81xK1WzRTqBA,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,muJCK7EjtyxvpcI2u1M9rlG-9nVdZeLOTj48BPkpNqcNdqOWhi26cVvFtvGyDmDzuPw7vK0H9lI8Q0NA128GZJ9nYGL0bEZsS1Kd3zwjsrI,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
Jenna Pontious She/Hers
9781 Edenbrook Dr
Riverside CA 92503
Grace and Peace be yours in abundance
Sent from my iPad

Letter I-605

Jenna Pontious
March 7, 2023

I-605.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: jenna pontious <jennapbird@icloud.com>
Sent: Tuesday, March 7, 2023 12:04 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Jenna Pontious She/Hers
9781 edenbrook dr
Riverside CA 92503
Grace and Peace be yours in abundance
Sent from my iPad

Letter I-606

Jenna Pontious
March 7, 2023

I-606.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: jenna pontious <jennapbird@icloud.com>
Sent: Tuesday, March 7, 2023 12:04 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Jenna Pontious She/Hers
9781 Edenbrook Drive
Riverside CA 92503
Grace and Peace be yours in abundance
Sent from my iPad

Letter I-607

Jenna Pontious
March 7, 2023

I-607.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Tuesday, March 7, 2023 9:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Linda Tingley Rivera, 922 Kilmarnock Way, Riverside, CA 92508 Linda.tingley@yahoo.com

Sent from my iPhone

Letter I-608

Linda Tingley
March 7, 2023

I-608.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:48 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. There is no analysis that I can find to justify this assertion *nor is there any agreement to not replace jobs with AI now or in the future. Please provide any analysis that you may have. The softening of the labor market is not due to the absence of jobs. Jobs are abundant because of the Gig economy changing landscape. We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI..*

I-609.1

Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest!

I-609.2

Sincerely,
Mark Sullivan, Jennifer and family

Mark and Jennifer Sullivan

Letter I-609

Mark and Jennifer Sullivan
March 7, 2023

I-609.1 This comment is the first two paragraphs of Form Letter F – Jobs. In response to this comment, please see Form Letter F Response. The comment further questions the potential for job replacement through AI. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

I-609.2 This comment expresses concern about the health effects of increased air pollution from vehicle and truck traffic. The Draft EIR assessed the Project's health risks in Recirculated Section 4.2, Air Quality and Appendix C-2. At R11 (971 Saltcoats Drive), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, and Appendix C-2, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts.

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From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:51 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I-610.1

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000. My household has advised elected officials of the traffic issues here with open school districts and the inability to get out of our neighborhood during drop off and pick up time.

We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI. Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

I-610.2

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest!

Sincerely,
Mark Sullivan, Jennifer and family

Mark and Jennifer Sullivan

Letter I-610

Mark and Jennifer Sullivan
March 7, 2023

I-610.1 This comment is the first two paragraphs of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-610.2 This comment is the same as I-609.2. Please see Response I-609.2.

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From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:52 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-611.1

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be. *We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI..* I-611.2

Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest! I-611.3

Sincerely,
Mark Sullivan, Jennifer and family

Mark and Jennifer Sullivan

Letter I-611

Mark and Jennifer Sullivan
March 7, 2023

I-611.1 This comment is the first two paragraphs of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-611.2 This comment states that the analysis does not take into account the cumulative impacts of adjacent projects. In response to this comment, please see Topical Response 7 – Cumulative Impacts. The comment further questions the potential for job replacement through AI. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

I-611.3 is the same as I-609.2. Please see Response I-609.2.

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From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:54 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-612.1

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? *We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI..* I-612.2

Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest! I-612.3

Sincerely,
Mark Sullivan, Jennifer and family

Mark and Jennifer Sullivan

Letter I-612

Mark and Jennifer Sullivan
March 7, 2023

I-612.1 This comment is the first two paragraphs of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-612.2 This comment discusses the potential for jobs to be filled by AI in the future. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

I-612.3 This comment is the same as I-609.2. Please see Response I-609.2, above.

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From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:55 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive s (remaining template is not available, but it's the same template as the others you have received).

I-613.1

We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI..

I-613.2

Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest!

I-613.3

Sincerely,
Mark Sullivan, Jennifer and family

Mark and Jennifer Sullivan

Letter I-613

Mark and Jennifer Sullivan
March 7, 2023

I-613.1 This comment letter is the first two paragraphs of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

I-613.2 This comment discusses the potential for jobs to be filled by AI in the future. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

I-613.3 This comment is the same as I-609.2. Please see Response I-609.2, above.

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From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:56 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I-614.1

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database w (template was cut off, but this is the same template as the other you have received for the environmental wildlife template).

We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI..

I-614.2

Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest!

I-614.3

Sincerely,
Mark Sullivan, Jennifer and family

Mark and Jennifer Sullivan

Letter I-614

Mark and Jennifer Sullivan
March 7, 2023

I-614.1 This comment is the first half of Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

I-614.2 This comment discusses the potential for jobs to be filled by AI in the future. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

I-614.3 This comment is the same as I-609.2. Please see Response I-609.2.

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From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:57 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance.

I-615.1

We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI..

I-615.2

Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest!

I-615.3

Sincerely,
Mark Sullivan, Jennifer and family

Mark and Jennifer Sullivan

Letter I-615

Mark and Jennifer Sullivan
March 7, 2023

I-615.1 This comment is the first half of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-615.2 This comment discusses the potential for jobs to be filled by AI in the future. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

I-615.3 This comment is the same as I-609.2. Please see Response I-609.2.

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From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:58 AM
To: Dan Fairbanks
Subject: Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Our address is 19228 Hitching Post Place, Riverside, CA 92508.

Mark and Jennifer Sullivan

From: The Sullivan's
Sent: Tuesday, March 7, 2023 8:48 AM
To: fairbanks@marchjpa.com <fairbanks@marchjpa.com>
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-616.1

The justification for this widely opposed project appears to be the creation of 2,600 jobs. There is no analysis that I can find to justify this assertion *nor is there any agreement to not replace jobs with AI now or in the future. Please provide any analysis that you may have. The softening of the labor market is not due to the absence of jobs. Jobs are abundant because of the Gig economy changing landscape. We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI..*

Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest!

Sincerely,

Mark Sullivan, Jennifer and family

Mark and Jennifer Sullivan

Letter I-616

Mark and Jennifer Sullivan
March 7, 2023

I-616.1 This comment is a duplicate of Letter I-609 but with an address added. As such, please see Responses to Letter I-609.

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From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:58 AM
To: Dan Fairbanks
Subject: Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Our address is 19228 Hitching Post Place, Riverside, CA 92508.

Mark and Jennifer Sullivan

From: The Sullivan's
Sent: Tuesday, March 7, 2023 8:51 AM
To: fairbanks@marchjpa.com <fairbanks@marchjpa.com>
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-617.1

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be. *We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI..*

Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest!

Mark Sullivan, Jennifer and family

Mark and Jennifer Sullivan

Letter I-617

Mark and Jennifer Sullivan
March 7, 2023

I-617.1 This comment is a duplicate of Letter I-611 but with an address added. As such, please see Responses to Letter I-611.

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From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:58 AM
To: Dan Fairbanks
Subject: Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Our address is 19228 Hitching Post Place, Riverside, CA 92508.

Mark and Jennifer Sullivan

From: The Sullivan's
Sent: Tuesday, March 7, 2023 8:55 AM
To: fairbanks@marchjpa.com <fairbanks@marchjpa.com>
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I-618.1

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive s (remaining template is not available, but it's the same template as the others you have received).

We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI..

Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest!

Mark Sullivan, Jennifer and family

Mark and Jennifer Sullivan

Letter I-618

Mark and Jennifer Sullivan
March 7, 2023

I-618.1 This comment is a duplicate of Letter I-613 but with an address added. As such, please see Responses to Letter I-613.

INTENTIONALLY LEFT BLANK

From: The Sullivan's <markandjenn11966@outlook.com>
Sent: Tuesday, March 7, 2023 8:59 AM
To: Dan Fairbanks
Subject: Re: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Our address is 19228 Hitching Post Place, Riverside, CA 92508.

Mark and Jennifer Sullivan

From: The Sullivan's
Sent: Tuesday, March 7, 2023 8:57 AM
To: fairbanks@marchjpa.com <fairbanks@marchjpa.com>
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

I-619.1

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance.

We don't need warehouses reducing quality of life in neighborhoods to create jobs which will be filled by AI..

Moreover, we have a large community of asthmatics in Orangecrest including my entire family who moved here for better air quality. Air quality matters in this neighborhood! Increased traffic and trucks in this area will increase Riverside resident's medical costs, the burden on our hospitals and absenteeism from school/work.

This is not just a traffic issue and a nuisance, it's a health issue that will detrimentally impact Riverside residents and increase local government and warehouse corporation's liability. ALL FOUR VOTERS in my household are OPPOSED to warehouses being built in Orangecrest!

Sincerely,
Mark Sullivan, Jennifer and family

Letter I-619

Mark and Jennifer Sullivan
March 7, 2023

I-619.1 This comment is a duplicate of Letter I-615 but with an address added. As such, please see Responses to Letter I-615.

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From: Michele Muehls <michelebello@hotmail.com>
Sent: Tuesday, March 7, 2023 10:33 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, I appreciate you taking the time to read this.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Michele Muehls
5908 Hawarden Drive
Riverside, CA 92506
michelebello@hotmail.com

Letter I-620

Michele Muehls
March 7, 2023

I-620.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Michele Muehls <michelebello@hotmail.com>
Sent: Tuesday, March 7, 2023 10:34 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, I know there are a lot of letters coming across your email but I sincerely appreciate your time.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Michele Muehls
5908 Hawarden Drive
Riverside, CA 92506
michelebello@hotmail.com

Letter I-621

Michele Muehls
March 7, 2023

I-621.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Michele Muehls <michelebello@hotmail.com>
Sent: Tuesday, March 7, 2023 10:35 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, I hope you're doing well and enjoying this lovely day.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Michele Muehls
5908 Hawarden Drive
Riverside, CA 92506
michelebello@hotmail.com

Letter I-622

Michele Muehls
March 7, 2023

I-622.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Michele Muehls <michelebello@hotmail.com>
Sent: Tuesday, March 7, 2023 10:37 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, thank you for taking the time to read this letter.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Michele Muehls
5908 Hawarden Drive
Riverside, CA 92506
michelebello@hotmail.com

Letter I-623

Michele Muehls
March 7, 2023

I-623.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Michele Muehls <michelebello@hotmail.com>
Sent: Tuesday, March 7, 2023 10:38 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, I sincerely appreciate you taking the time to read and consider my letter!

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Michele Muehls
5908 Hawarden Drive

Letter I-624

Michele Muehls
March 7, 2023

I-624.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Michele Muehls <michelebello@hotmail.com>
Sent: Tuesday, March 7, 2023 10:40 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, my community is united in this cause, and we appreciate your time in this matter!

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Michele Muehls
5908 Hawarden Drive
Riverside, CA 92506
michelebello@hotmail.com

Letter I-625

Michele Muehls
March 7, 2023

I-625.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: MJ Rivera <milo.rivera21052@gmail.com>
Sent: Tuesday, March 7, 2023 12:34 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Milo Rivera
922 Kilmarnock Way
Riverside, CA. 92508
milo.rivera21052@gmail.com

<include name, address, email in signature line>

Letter I-626

Milo Rivera
March 7, 2023

I-626.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: MJ Rivera <milo.rivera21052@gmail.com>
Sent: Tuesday, March 7, 2023 12:41 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Milo Rivera
922 Kilmarnock Way
Riverside, CA. 92508
milo.rivera21052@gmail.com

<include name, address, email in signature line>

Letter I-627

Milo Rivera
March 7, 2023

I-627.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: Michelle Singleton <michellesingleton.adem67@gmail.com>
Sent: Tuesday, March 7, 2023 9:19 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Michelle Singleton
30492 Shenandoah Ct, Menifee, CA 92584
michellesingleton.adem67@gmail.com
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Michelle D. Singleton

Letter I-628

Michelle Singleton
March 7, 2023

I-628.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Michelle Singleton <michellesingleton.adem67@gmail.com>
Sent: Tuesday, March 7, 2023 9:20 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Michelle Singleton
30492 Shenandoah Ct, Menifee, CA 92584
michellesingleton.adem67@gmail.com
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Michelle D. Singleton

Letter I-629

Michelle Singleton
March 7, 2023

I-629.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Michelle Singleton <michellesingleton.adem67@gmail.com>
Sent: Tuesday, March 7, 2023 9:21 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Michelle Singleton
30492 Shenandoah Ct, Menifee, CA 92584
michellesingleton.adem67@gmail.com

--
Michelle D. Singleton

Letter I-630

Michelle Singleton
March 7, 2023

I-630.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Michelle Singleton <michellesingleton.adem67@gmail.com>
Sent: Tuesday, March 7, 2023 9:21 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Michelle Singleton
30492 Shenandoah Ct, Menifee, CA 92584
michellesingleton.adem67@gmail.com

--
Michelle D. Singleton

Letter I-631

Michelle Singleton
March 7, 2023

I-631.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Michelle Singleton <michellesingleton.adem67@gmail.com>
Sent: Tuesday, March 7, 2023 9:22 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Michelle Singleton
30492 Shenandoah Ct, Menifee, CA 92584
michellesingleton.adem67@gmail.com
--
Michelle D. Singleton

Letter I-632

Michelle Singleton
March 7, 2023

I-632.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Michelle Singleton <michellesingleton.adem67@gmail.com>
Sent: Tuesday, March 7, 2023 9:22 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Michelle Singleton
30492 Shenandoah Ct, Menifee, CA 92584

michellesingleton.adem67@gmail.com
--
Michelle D. Singleton

Letter I-633

Michelle Singleton
March 7, 2023

I-633.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Michelle Singleton <michellesingleton.adem67@gmail.com>
Sent: Tuesday, March 7, 2023 9:23 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Michelle Singleton
30492 Shenandoah Ct, Menifee, CA 92584
michellesingleton.adem67@gmail.com
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Michelle D. Singleton

Letter I-634

Michelle Singleton
March 7, 2023

I-634.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Cindy Camargo
Sent: Tuesday, March 7, 2023 8:26 AM
To: Dan Fairbanks
Cc: Dr. Grace Martin
Subject: FW: March JPA - West Campus Upper Plateau Comment Submit

Good morning Dan, please see below.

Thank you,

Cindy Camargo, CAP
Executive Assistant & Notary Public
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
951-656-7000 [Office]
951-288-3548 [Cell]
March JPA – FTZ #244 Grantee
camargo@marchjpa.com
www.marchjpa.com
www.marchinlandport.ca

From: March JPA <info@marchjpa.com>
Sent: Tuesday, March 7, 2023 7:57 AM
To: mjpawestmarch@marchjpa.com; Info <info@marchjpa.com>; info@marchjpa.org
Subject: March JPA - West Campus Upper Plateau Comment Submit

Name: Michael Wilson
Email: Bloomington51@outlook.com
Message: I wish to address an issue in the Aesthetics section of the Environmental Impact Report which received no attention but deserves consideration.

Section 4, Aesthetics, addresses views of the project area and scenic vistas from publicly-accessible points at ground level only. Page 4.1-3 contains the statement "…views from private residences are not considered in this analysis as they are not covered under CEQA Guidelines." While the CEQA Guidelines are not concerned with views of the project site from private locations, Section 15064 does give the Lead Agency (in this case, March JPA) the discretion of setting its own thresholds of significance for environmental effects that could have been included in the report. March JPA has, either intentionally for the purpose of expediting approval of the project, or as an oversight by presumption of public opinion, not given regard to the effect of the development on public perception, attitude, and mental health, particularly of those in the community most impacted through their immediate proximity to the project property in all its phases of development and activity.

I-635.1

The justification for minimizing the impact of project development views from private locations can be attributed either to the small number of people impacted, or the significance of the impact itself. In my analysis of the perimeter of the project area, I counted 276 residences immediately adjacent to the development property on three sides. Of those, 192 residences will be adjacent to some form of development, with the rear side of the residences facing either structures, sports field/park, or the access road. Most of these residences are in the newer residential developments of Mission

Grove and Orangecrest, and those are overwhelmingly two-story structures, with views through second-floor rear windows looking over fences and walls down onto adjacent project property and beyond. What is now seen as open fields with vegetation, with some old bunkers, power poles, and fences, will become largely industrial and business buildings with paved parking lots, loading docks, trucks, and parked trailers. It will go from land occupied exclusively by small animals living among the grass, shrubs, and rocks, to land largely covered by asphalt, concrete, and vehicles. There will also be noise, lighting, and added air pollution, the sources of which will be obvious, coming with the project development. No consideration is given in the EIR to the potential effects on the morale of residents who have appreciated the property in its current state, and in some cases, moved to where they now live because of it with the expectation that it would remain so because it was an endangered Stephens' Kangaroo Rat habitat.

I-635.1 Cont.

I submit that the number of residents affected by the aesthetics is significant enough to warrant consideration. I also submit that the effects on morale, and even mental health, of residents in immediate proximity of this project must be considered. The value of greenspace—an area of grass, trees, and vegetation in urban areas, even if it is just for aesthetics—is being increasingly recognized as important for overall health (for example, see Why More Green Space is Essential for Cities, isoglobal.org, Oct. 28, 2021). Even in this project, the desirability of undeveloped area is acknowledged, as some of the project property will be left as is. (It does, however, give the appearance of being a token gesture, an attempt to minimize community objection along with providing amenities assumed to make the commercial-industrial part of the project palatable.) Section 15064.7(a) of the CEQA Guidelines allows for the environmental effect to be of a qualitative level, which this is. It is subjective, but it is real, with real effects that rightfully should not be disregarded. Section 15064(e) of the Guidelines states "…economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant." The existence of adverse effects expected from proceeding with this project is not acknowledged even though it has been communicated at public meetings and in communications with elected officials in person and by letters.

I-635.2

Forced replacement of comfort with discomfort and the effect on mental health is the main issue here, but it is compounded by, first, that it is a change judged as unnecessary by the community, and, second, that there is even a perception that an agency expected to protect community interests misjudges or disregards those interests. As evidenced in the EIR by the attention given to views from publicly-accessible points, there is interest in pleasing members of the general public who may drive or stroll by, who may or may not take a look, and then move on, but not for the feelings of residents who have made a commitment and investment in being where they are and won't have a choice about what they will see if they want to look out their upstairs rear windows.

Sincerely,

Michael Wilson
7642 Greenock Way
Riverside, Ca 92508

Letter I-635

Michael Wilson
March 7, 2023

I-635.1 The comment raises concerns that the Draft EIR does not consider aesthetic impacts to private views. The lead agency has the discretion to set its own thresholds of significance for assessing environmental effects, in accordance with Section 15064.7 of the State CEQA Guidelines. March JPA, as the lead agency, has adopted Local CEQA Guidelines. The Draft EIR's analysis on aesthetics from publicly-accessible vantage points, as opposed to effects on private views, is in accordance with CEQA case law. This is supported by numerous court cases, including *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 402; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492-493; and *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720, 734. However, the public viewpoints selected for analysis have similar vantage points and views as surrounding private development so the Draft EIR discloses potential impacts to private views. No changes or revisions to the Draft EIR are required in response to this comment.

I-635.2 The comment raises general concerns regarding the proposed Project's impacts related to noise, lighting, and air pollution. The Draft EIR analyzes these environmental topic areas within Sections 4.11, Noise, and 4.1, Aesthetics, and Recirculated Section 4.2, Air Quality, respectively.

This comment states the Project site was identified as habitat for Stephens Kangaroo Rat (SKR) and not to be developed. As discussed in Recirculated Section 4.10, Land Use and Planning, since the development of the March JPA General Plan in 1999, the Project site has been designated for development. Although Exhibit 5-1 of the March JPA General Plan identifies the former Weapons Storage Area as SKR Open Space and the remainder of the Project site as SKR Management Area, the General Plan explains the intent to purchase better quality SKR habitat elsewhere so that "the lands currently designated for SKR management and open space purposes will be available for development." Figure 1-4, Land Use Plan, of the March JPA General Plan designates the former Weapons Storage Area as Park/Recreation/Open Space and the remainder of the Project site as Business Park. The swap of March JPA lands, including the Project site, for more and better quality SKR habitat was the subject of the 2012 Settlement Agreement with the Center for Biological Diversity and San Bernardino Valley Audubon Society (Appendix S). Under the CBD Settlement Agreement, the land uses were inverted, with the Weapons Storage Area identified for development, along with a 60-acre park, and the remainder of the Project site identified as a conservation easement (see Figure 3-4 of the Draft EIR). The Project's potential direct and indirect impacts to SKR and its habitat are evaluated within Section 4.3, Biological Resources, of the Draft EIR. With implementation of MM-BIO-1 (Best Management Practices), MM-BIO-3 (Operation-Related Indirect Impacts to Special-Status Wildlife), and MM-BIO-4 (Stephens' Kangaroo Rat Avoidance and Mitigation), the Project's direct and indirect impacts to SKR and its habitat would be less than significant.

The comment also asserts the Draft EIR does not consider the potential effects on morale or mental health for surrounding residents as a result of the Project site's redevelopment, citing CEQA Guidelines Section 15064(e). The comment misinterprets CEQA Guideline Section 15064(e) which states in its first sentence that "[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment." The Guideline uses overcrowding of a public facility that causes an adverse effect on people as an example of a physical change that could be used as factor in

determining whether the physical change is significant. There is no factual or legal support for the idea that an effect on morale is considered a factor that could cause a physical change to be deemed significant. Impacts related to morale are not recognized in CEQA as an environmental topic area. *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 576-82 (CEQA does not require analysis of psychological and social impacts of negative impacts on city's community character). Overall, the comment's suggestion is not in line with the physical impacts associated with the overcrowding example as described in Section 15064(e) of the State CEQA Guidelines. No changes or revisions to the Draft EIR are required in response to this comment.

From: Rod Deluhery <rod.deluhery@gmail.com>
Sent: Tuesday, March 7, 2023 6:43 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-636.1

I was told by a senior guard at the facility, many years ago, that the chemical hazards at the site are huge. What did he know, that this project is ignoring?
We know that past military operations are hidden in secrecy. There is no audit trail of what the military did here. Why is the hazards at the site being ignored??

Nuclear munitions were probably kept here at the west campus. Legacy nuclear weapons - I think around the 60's, had many maintenance tasks that were done to keep them operational. Where did they dispose of this maintenance waste? Perhaps at the site itself? Has the Air Force had any input on this? Have they confirmed or do they deny nuclear weapons were stored there? I-636.2

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area. I-636.3

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-

phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

I-636.3 Cont.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Rod Deluhery
18870 Lurin Ave.
Riverside Ca. 92508
rod.deluhery@gmail.com

Letter I-636

Rod Deluhery
March 7, 2023

I-636.1 This comment is the same as the introduction of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

I-636.2 This comment raises concerns about chemical hazards related to past military operations at the site, and speculates that nuclear munitions were provided stored at the site. In response to this comment, please see Recirculated Section 4.8, Hazards and Hazardous Materials, regarding site investigation.

I-636.3 This comment is the same as Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Rosario Garcia <byr0421@hotmail.com>
Sent: Tuesday, March 7, 2023 11:51 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Rosario Garcia
92508

Letter I-637

Rosario Garcia
March 7, 2023

I-637.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Rosario Garcia <byr0421@hotmail.com>
Sent: Tuesday, March 7, 2023 11:54 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Rosario Garcia

92508

Letter I-638

Rosario Garcia
March 7, 2023

I-638.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Rosario Garcia <byr0421@hotmail.com>
Sent: Tuesday, March 7, 2023 11:56 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Rosario Garcia

92508

Letter I-639

Rosario Garcia
March 7, 2023

I-639.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Rosario Garcia <byr0421@hotmail.com>
Sent: Tuesday, March 7, 2023 12:00 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Rosario Garcia
92508

Letter I-640

Rosario Garcia
March 7, 2023

I-640.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Rosario Garcia <byr0421@hotmail.com>
Sent: Tuesday, March 7, 2023 12:11 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Rosario Garcia

Letter I-641

Rosario Garcia
March 7, 2023

I-641.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Rosario Garcia <byr0421@hotmail.com>
Sent: Tuesday, March 7, 2023 12:14 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Rosario Garcia

92508

Letter I-642

Rosario Garcia
March 7, 2023

I-642.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Richard Stalder <xcoachrs@sbcglobal.net>
Sent: Tuesday, March 7, 2023 3:29 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

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The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

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The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

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The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Richard Stalder
3732 Beechwood Place
Riverside, CA o2506
xcoachrs@sbcglobal.net

Sent from my iPad

Letter I-643

Richard Stalder
March 7, 2023

I-643.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Stephanie Mendoza <plannersteph12@gmail.com>
Sent: Tuesday, March 7, 2023 11:32 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Stephanie Jimenez
8666 orchard park dr riverside 92508

Letter I-644

Stephanie Jimenez
March 7, 2023

I-644.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Stephanie Mendoza <plannersteph12@gmail.com>
Sent: Tuesday, March 7, 2023 11:33 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Stephanie Jimenez
8665 orchard park dr riverside 92508

Letter I-645

Stephanie Jimenez
March 7, 2023

I-645.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Stephanie Mendoza <plannersteph12@gmail.com>
Sent: Tuesday, March 7, 2023 11:34 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Stephanie Jimenez
8665 orchard park dr riverside 92508

Letter I-646

Stephanie Jimenez
March 7, 2023

I-646.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Stephanie Mendoza <plannersteph12@gmail.com>
Sent: Tuesday, March 7, 2023 11:35 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Stephanie Jimenez
8665 orchard park dr riverside 92508

Letter I-647

Stephanie Jimenez
March 7, 2023

I-647.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Stephanie Mendoza <plannersteph12@gmail.com>
Sent: Tuesday, March 7, 2023 11:36 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Stephanie Jimenez
8665 orchard park riverside 92508

Letter I-648

Stephanie Jimenez
March 7, 2023

I-648.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Stephanie Mendoza <plannersteph12@gmail.com>
Sent: Tuesday, March 7, 2023 11:36 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Stephanie Jimenez
8666 orchard park dr riverside 92508

Letter I-649

Stephanie Jimenez
March 7, 2023

I-649.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Stephanie Mendoza <plannersteph12@gmail.com>
Sent: Tuesday, March 7, 2023 11:37 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Stephanie Jimenez
8665 orchard park dr riverside 92508

Letter I-650

Stephanie Jimenez
March 7, 2023

I-650.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: CHRISTINE MARTIN <timnchrismartin@aol.com>
Sent: Tuesday, March 7, 2023 7:57 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

I-651.1

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I-651.1 Cont.

As an adult with cystic fibrosis, which is recognized as a disability in the Americans With Disabilities Act (ADA), I would like to know what measures you will take to ensure the legal protections afforded to me and others like me in the proximity of your proposed warehouses will not be ignored or violated.

I-651.2

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I-651.3

Thank you for the opportunity to comment.

Sincerely,

Tim Martin
timnchrismartin@aol.com
5933 Shaker Dr.
Riverside, CA 92506

Letter I-651

Tim Martin
March 7, 2023

I-651.1 This comment is the same as Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-651.2 This comment questions the Project's measures to comply with the Americans with Disabilities Act (ADA). The Project would be built in compliance with ADA regulations and would not limit access to any of the surrounding areas.

I-651.3 This comment is the same as the conclusion within Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Tom Parkinson <cc88kp92@icloud.com>
Sent: Tuesday, March 7, 2023 1:01 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-652.1

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

I-652.1 Cont.

Sincerely,

<Tom Parkinson, 20646 Gelman dr. Orange Terrace resident for 28 years. This one's beautiful community that brought the feeling of your piece of the American dream has diminished to nothing but a concrete city. We have paid our dues. 951-236-5059

I-652.2

Sent from my iPhone

Letter I-652

Tom Parkinson
March 7, 2023

I-652.1 This comment is the same as Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-65.2 This comment expresses general opposition to the proposed Project and does not raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Wednesday, March 8, 2023 8:36 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

What do an airplane crashing into a warehouse, a warehouse fire, and a jack-knifed big rig on a residential street that stopped traffic for 45 minutes have in common? They all occurred in the Orangecrest neighborhood of Riverside within the past three years, with the warehouse fire and jack-knifed big rig both occurring on September 12 of this year; all three put local residents in danger; and all three were the result of the poor planning, lack of foresight, and utter disregard for local residents' well-being and safety demonstrated by the March Joint Powers Authority for at least the past 23 years. The West Campus Upper Plateau Project is only the most recent misguided and uninformed project that, similar to past projects, will be detrimental to the quality of life for Riverside, Perris, and Moreno Valley residents. I-653.1

Riverside consistently ranks near the top of any list of cities in California in terms of pollution and traffic congestion. If you have any doubts about that you should contact the California Air Resources Board on Iowa Avenue in Riverside or the College of Engineering Center for Environmental Research and Technology at UC Riverside, rather than relying on the biased environmental impact report that the developer clearly paid to be written in their favor. If the project is approved, the traffic and pollution problems will most certainly worsen, and they won't be localized to the City of Riverside. The City of Perris and the City of Moreno Valley will necessarily experience the detrimental impacts, as well. I-653.2

I demand that the developer specifically address how traffic and pollution problems will be mitigated, how big rigs will be strictly prohibited from using residential streets in perpetuity, and how airplane crashes and warehouse fires can be guaranteed never to occur again. If the developer is unable to meet any of those demands, the project should not be allowed to proceed. I-653.3 I-653.4 I-653.5

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-653

Aaron Bushong
March 8, 2023

I-653.1 This comment expresses opposition to the Project and identifies recent incidents involving warehouses, trucks and the March ARB. The comment does not raise specific issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR.

I-653.2 This comment raises general concerns regarding the Project's impacts to existing air quality and traffic conditions. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

I-653.3 This comment asks how the Project will mitigate for traffic and pollution problems. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. Section 4.15, Transportation, evaluated the Project VMT impact and determined it to be less than significant.

I-653.4 This comment questions how big rigs will be restricted from traveling on residential streets in perpetuity. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway.

Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions

of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. No changes or revisions to the EIR are required In response to this comment.

I-653.5 This comment questions how airplane crashes and warehouse fires can be guaranteed to never occur again. Both warehouse fires involved stored products and airplane crashes are anomalies and rarely occur. However, given the Project's proximity to the March Inland Port Airport, the risk of airplane crashes remains. The Riverside County Airport Land Use Commission (ALUC) reviews projects to maximize consistency with airport land use plans for projects within close proximity to an active airstrip. This Project has undergone review by ALUC, as discussed in Recirculated Section 4.10, Land Use and Planning. ALUC provided their consistency determination in a letter dated May 16, 2022, which is included within Appendix L of the Draft EIR.

As detailed in Recirculated Chapter 3, Project Description, and Topical Response 6 – Meridian Fire Station, a new Riverside County fire station will be constructed at Meridian Parkway and Opportunity Way. The provision of a new fire station within the Meridian Business Park will allow for more rapid response to any potential future warehouse fire. Given existing fire mutual aid agreements serving March JPA, the Project site would be adequately served by fire protection services through the buildout of the Specific Plan. In addition, Section 4.18, Wildfire, includes mitigation measures to help reduce wildfire-related impacts, such as MM-FIRE-1 (Pre-Construction Requirements). This measure would also help reduce impacts to fire protection services, as detailed in Section 4.13, Public Services. Moreover, the Project includes PDF-FIRE-1 through PDF-FIRE-3 which would ensure compliance with the California Fire Code, implementation of a fire protection plan, and educational materials on evacuation and wildfire risk. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Finally, MM-FIRE-2 would implement vegetation management measures and MM-FIRE-3 would require compliance with the Fuel Management Zone protections related to alternative materials and methods.

It is beyond the scope of this Project and EIR to guarantee that airplane crashes and warehouse fires will never occur again; however, the analysis within the Draft EIR, the consistency with the airport land use plan, and the buildout of the new Meridian Fire Station would minimize potential impacts to the Project site and surrounding communities in the event of another catastrophic event. No changes or revisions to the EIR are required in response to this comment.

From: Avery Cintura <acintura1@gmail.com>
Sent: Wednesday, March 8, 2023 2:26 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Avery Cintura, Chino CA, acintura1@gmail.com

Letter I-654

Avery Cintura
March 8, 2023

I-654.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: christine martin <cmcelsemartin@gmail.com>
Sent: Wednesday, March 8, 2023 8:22 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-655.1

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Considering the significant growth predicted for Riverside, please explain your rationale for not developing a large percentage of this land as residential and recreational uses. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. I-655.2

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. I-655.3

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as

shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Christine M.Clese Martin
5933 Shaker Drive
Riverside, CA 92506
cmcelsemartin@gmail.com

I-655.3
Cont.

Letter I-655

Christine Martin
March 8, 2023

I-655.1 This comment letter is the same as the beginning of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-655.2 This comment requests that, given the significant growth projected for Riverside, the Draft EIR explain the rationale for not developing the site as residential and recreational uses. The rationale for not developing the site with residential uses is discussed in Topical Response 8 – Alternatives. Regarding recreational uses, the Project includes 78.0 acres of Parks/Recreation/Open Space as well as 445.43 acres of Conservation Area; therefore, 523.43 acres of the 817.90-acre Project site would be set aside for recreational and open space uses.

I-655.3 This comment letter is the same as the remainder of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: christine martin <cmcelsemartin@gmail.com>
Sent: Wednesday, March 8, 2023 8:23 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Christine M.Clese Martin
5933 Shaker Drive
Riverside, CA 92506
cmcelsemartin@gmail.com

Letter I-656

Christine Martin
March 8, 2023

I-656.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: greg garnier <gcg8821@gmail.com>
Sent: Wednesday, March 8, 2023 6:02 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Greg Garnier, Riverside, CA 92508

Letter I-657

Greg Garnier
March 8, 2023

I-657.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: John Lyell <jlyell@verizon.net>
Sent: Wednesday, March 8, 2023 1:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents in an area already known for some of the worst air quality in the US . i still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site? We would ask for significant mitigations to be put in place to reduce the impacts on local residents. 1. Require that 40%

I-658.1

of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing. I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I-658.1 Cont.

I ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected? Thank you for the opportunity to comment.

As previously recommended the March JPA should think "outside the box" here and review the City of Irvine's Great Park handling and the current and future amenities it brings to the community with very similar, former US Government, property.

I-658.2

Now at the Park | City of Irvine

https://youtu.be/odQxP0ac2UQ

The March JPA also should have been in discussions with Microsoft, Google, and Amazon on locating a high-tech cloud computing data center at the location as this would be a win-win for all parties involved. Lower cost of operations for the tech company and high paying jobs for the communities and no big rig traffic nor increased air pollution in an area already one of the worst in the nation. Riverside also cannot afford to maintain their current thoroughfares, this increased truck traffic would significantly increase the cost here.

I-658.3

Sincerely,

John Lyell

Letter I-658

John Lyell
March 8, 2023

I-658.1 This comment is a slightly modified version of Form Letter B – Air Quality with the addition of the following phrase at the end of the first sentence of the second paragraph: "…in an area already known for some of the worst air quality in the US." The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter B Response.

I-658.2 This comment suggests that March JPA consider an alternative similar to Irvine's Great Park. In response to this comment, please see Topical Response 8 – Alternatives, where an explanation is provided for why a large park similar to Irvine's Great Park was considered but not analyzed.

I-658.3 This comment suggests that March JPA would consider discussions with Microsoft, Google and Amazon for locating high-tech cloud computing data centers at the Project site. Occupants for the Project site have not been determined at this time, and the land use designations within the Specific Plan would not preclude these uses in the future. The commenter notes that high-tech cloud computing data centers would reduce truck traffic, and therefore, air pollution. Because the occupants of the proposed Project are not known at this time, the Draft EIR considered the environmental impacts of more intensive uses being located at the site. Should a high-tech cloud computing data center locate at the site, this use would result in fewer vehicle trips. However, given the uncertainty at this time, the Draft EIR discloses potential impacts for more intensive uses. No changes or revisions to the EIR are required in response to this comment.

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From: John Lyell <jlyell@verizon.net>
Sent: Wednesday, March 8, 2023 2:08 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.

The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. I-659.1

You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built?

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the

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

I-659.1 Cont.

It is known fact the City of Riverside for years now has not had the funding to make the needed repairs to city streets. Significantly increased traffic in this area, especially large trucks, will significantly exacerbate this issue, and as previously mentioned, trucks today regularly break the law and the city does little to enforce them.

I-659.2

Thank you!

Sincerely,

John Lyell

Letter I-659

John Lyell
March 8, 2023

I-659.1 This comment is the same Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-659.2 This comment raises concerns regarding road repair funding. Commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[1]

The commenter also asks about the enforcement of trucks not following the established truck routes. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. No changes or revisions to the EIR are required in response to this comment.

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

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From: John Lyell <jlyell@verizon.net>
Sent: Wednesday, March 8, 2023 2:28 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

I believe a task force is needed to work collaboratively in achieving an outcome that can benefit all parties. Personally I believe some of this former US government property should have been used for a large regional park, like Irvine Park and now the Great Park. I have heard of flight path concerns, but they seem illogical as planes fly over houses today on an almost daily basis. This would be an opportunity for a huge showcase attraction for the area and for residents of the surrounding communities. Large sports facilities also can be very profitable for youth sport tournaments, some of which have been known to bring in over a quarter of million $ on a long weekend, and even more to local food, hotel, and other establishments. I-660.1

Irvine Regional Park | OC Parks

As previously recommended the March JPA should think "Outside the box" here and review the City of Irvine's Great Park handling and the current and future amenities it brings to the community with very similar, former US Government, property.

Now at the Park | City of Irvine

https://youtu.be/odQxP0ac2UQ

The March JPA also should have been in discussions with Microsoft, Google, and Amazon on locating a high-tech cloud computing data center at the location as this would be a win-win for all parties involved. Lower cost of operations for the tech company and high paying jobs for the communities and no big rig traffic nor increased air pollution in an area already one of the worst in the nation. It is well known Riverside , for years now, cannot afford to maintain their current thoroughfares, this increased truck traffic would significantly increase the cost here. I-660.2

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside and fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-660.3

The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's

land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. Under Planning Process C1F, the Final Reuse Plan (1996) reads: “Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base.” Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being “seriously” and “carefully” considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies? In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should “discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions” and “Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses.” How does building 4.7 million square feet of industrial warehouses that have “significant and unavoidable” noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how ”the planning processing was designed to incorporate consensus of the adjacent communities, creation of a ‘Community Preference’ land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse” (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan? As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for ‘Industrial/Warehousing’ uses and it explicitly shows ‘Industrial/warehousing’ land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen’s Kangaroo Rat. Moreover, the Draft General Plan 2010 “Draft Vision 2030” Section 2.2.24 stated, “The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred. Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to ‘upzone’ the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of

I-660.3 Cont.

signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use.

Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process and seek a win-win solution that all can be proud of.

I-660.3 Cont.

Thank you for letting me comment on your project.

Sincerely,

John Lyell

Letter I-660

John Lyell
March 8, 2023

I-660.1 This comment suggests that March JPA consider an alternative similar to Irvine's Great Park. In response to this comment, please see Topical Response 8 – Alternatives, where an explanation is provided for why a large park similar to Irvine's Great Park was considered but not analyzed.

I-660.2 This comment suggests that March JPA would consider discussions with Microsoft, Google and Amazon for locating high-tech cloud computing data centers at the Project site. Occupants for the Project site have not been determined at this time, and the land use designations within the Specific Plan would not preclude these uses in the future. The commenter notes that high-tech cloud computing data centers would reduce truck traffic, and therefore, air pollution. Because the occupants of the proposed Project are not known at this time, the Draft EIR considered the environmental impacts of more intensive uses being located at the site. Should a high-tech cloud computing data center locate at the site, this use would result in fewer vehicle trips. However, given the uncertainty at this time, the Draft EIR discloses potential impacts for more intensive uses. No changes or revisions to the EIR are required in response to this comment.

I-660.3 This comment is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, March 8, 2023 7:23 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

After sitting in traffic, hemmed in by semi truck after semi truck after semi truck on the 215 South, I feel compelled to comment on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing

warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
<include name, address, email in signature line>

Sent from my iPhone

Letter I-661

Kristy Doty
March 8, 2023

I-661.1 This comment letter is a slightly modified version of Form Letter G – Traffic with the addition of: "After sitting in traffic, hemmed in by semi truck after semi truck after semi truck on the 215 South, I feel compelled to comment…" The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter G Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, March 8, 2023 7:27 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

It is common knowledge to area residents that hazardous materials were stored in the bunkers in the property.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

<include name, address, email in signature line>

Sent from my iPhone

Letter I-662

Kristy Doty
March 8, 2023

I-662.1 This comment letter is a slightly modified version of Form Letter D – Hazards with the addition of: "It is common knowledge to area residents that hazardous materials were stored in the bunkers in the property." The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter D Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, March 8, 2023 7:33 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-663.1

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

What is wrong with having an open space where local residents can hike, observe nature, and enjoy the ambience of nature? Study after study shows the positive impact of open spaces on people's mental health, reduction of stress and anxiety. Why would you take that away?? I-663.2

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

I-663.3

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

<include name, address, email in signature line>

Sent from my iPhone

Letter I-663

Kristy Doty
March 8, 2023

I-663.1 This comment is the same as the first half of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-663.2 This comment raises concerns about the loss of recreational open space. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

I-663.3 This comment is the same as the second half of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, March 8, 2023 7:37 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-664.1

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

What is wrong with having an open space where local residents can hike, observe nature, and enjoy the ambience of nature? Study after study shows the positive impact of open spaces on people's mental health, reduction of stress and anxiety. Why would you take that away??

I-664.2

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

I-664.3

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Kristine Doty
8805 Morninglight Circle
92508
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-664

Kristy Doty
March 8, 2023

I-664.1 This comment is the same as a portion of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-664.2 This comment raises concerns about the loss of recreational open space. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. Al think s part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

I-664.3 This comment is the same as the last two paragraphs of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, March 8, 2023 7:39 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

After sitting in traffic, hemmed in by semi truck after semi truck after semi truck on the 215 South, I feel compelled to comment on the March Joint Powers March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing

warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Kristy Doty
Dkdoty2@gmail.com
Orangecrest, 92508

Sent from my iPhone

Letter I-665

Kristy Doty
March 8, 2023

I-665.1 This comment letter is a slightly modified version of Form Letter G – Traffic with the addition of: "After sitting in traffic, hemmed in by semi truck after semi truck after semi truck on the 215 South, I feel compelled to comment…" The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter G Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Wednesday, March 8, 2023 7:49 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

I-666.1

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-666.1 Cont.

Shouldn't the people most impacted by the project have the most input? Residents have made their wishes very very clear -yet no part of the plan has been altered to reflect those wishes. Please use this opportunity to require the developer to submit alternate uses for the land that are inline with the original historical context of the proposed plan.

I-666.2

Thank you for letting me comment on your project.

Sincerely,

KrisTy Doty
8805 Morninglight Circle
Orangecrest, 92508
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-666

Kristy Doty
March 8, 2023

I-666.1 This comment is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-666.2 This comment requests more input from residents and an alternative more in line with the original historical context of the proposed plan be considered. The March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three workshops, and one Zoom virtual meeting with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. As discussed in Recirculated Section 4.10, Land Use and Planning, since the development of the March JPA General Plan in 1999, the Project site has been designated for development. The General Plan includes warehousing in the definition of Business Park uses. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. Additionally, in response to the request that an Alternative more in line with the historical context be considered, please see Topical Response 8 – Alternatives, which introduces Alternative 5, a new Non-Industrial Alternative.

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From: Lisa Everson <leverson@earthlink.net>
Sent: Wednesday, March 8, 2023 7:24 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project’s warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project’s land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife
* The applicant should expand their analysis to include theWestern Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.

* Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life
* Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?

* Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

I-667.1

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

I-667.1 Cont.

The project applicant conceded that there will be “significant and unavoidable” air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

I-667.2

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
* Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)

* Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I have lived in Riverside almost my entire life and am so saddened to see us becoming a warehouse community. My son moved away because he said he couldn't stand the air quality here and this will only make it worse for ourselves and our

I-667.3

families. I'm exhausted with the freeway congestion exacerbated by logistics. I don't understand what the motivation would be to put in all of these warehouses-they add nothing to the community that we need. I-667.3 Cont.

Thank you for the opportunity to comment.

Sincerely,

Lisa Everson
7642 Ayr Court
Riverside, CA 92508

Letter I-667

Lisa Everson
March 8, 2023

I-667.1 This comment is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

I-667.2 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-667.3 This comment expresses concern about worsening air quality in Riverside as well as freeway congestion exacerbated by logistics. This comment expresses general opposition to the proposed Project and does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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From: Lenora Mitchell <rageturner@gmail.com>
Sent: Wednesday, March 8, 2023 4:19 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-668.1

This is a nightmare of huge proportions for our community.
We have repeatedly communicated with you our profound grief and anxiety over this and yet you proceed. Why have you not proposed other development options to us? Is this not a moral obligation desired by the Air Force when March JPA was formed? To better the community and not obliterate it. Please review your mandate. I-668.2

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. I-668.3

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I-668.3 Cont.

Thank you for the opportunity to comment.

Sincerely,

Lenora Mitchell
14170 Vista Grande Dr
Riverside 92508
rageturner@gmail.com

Letter I-668

Lenora Mitchell
March 8, 2023

I-668.1 This comment is the same as the first paragraph of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-668.2 This comment expresses general opposition to the proposed Project. The comment does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided.

I-668.3 This comment is the same as the remainder of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Wednesday, March 8, 2023 8:43 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

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I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

<Linda k Tingley Rivera , 922Kilmarnock Way, Linda.Tingley @yahoo.com

Sent from my iPhone

Letter I-669

Linda Tingly
March 8, 2023

I-669.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Wednesday, March 8, 2023 8:46 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely, Linda K. TingleyRivera

<922 Kilmarnock Way, Riverside, Ca 92508 Linda.tingley@yahoo.com

Sent from my iPhone

Letter I-670

Linda Tingly
March 8, 2023

I-670.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Wednesday, March 8, 2023 8:48 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Linda K TingleyRivera, linda.tingley@yahoo.comin signature line>
922 Kilmarnock Way, Riverside,ca 92508

Sent from my iPhone

Letter I-671

Linda Tingly
March 8, 2023

I-671.1 This comment letter a duplicate of Letter I-669 and is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Linlin Zhao <fredzhaolin@gmail.com>
Sent: Wednesday, March 8, 2023 11:20 PM
To: Dan Fairbanks
Subject: Comments on Draft EIR West Campus Upper Plateau Project
Attachments: Comments EIR Zhao.pdf

Dear Mr. Fairbanks:

Thank you for the opportunity to comment on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project. Please find the attached letter with my comments. I-672.1

Sincerely,
Linlin Zhao
Riverside, CA
92508

March 8, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on the record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500 foot range of residential homes. The Draft EIR does not properly analyze the Project's Hazards and Hazardous Materials (Section 4.8).

I am an Assistant Professor in the Department of Chemistry at the University of California, Riverside. I have a Ph.D. in Analytical Chemistry from the University of Connecticut and have > 15 years of experience in chemical analysis, chemical toxicology, and mechanistic studies of carcinogens. I have published nearly 40 peer-reviewed papers in highly regarded scientific journals in the fields of analytical chemistry, biochemistry, and chemical toxicology, which have been cited more than 1300 times by peers.

I-672.2

My comments reflect documents available publicly on the March JPA website. These documents include:

- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al.), 2022
- General Plan of the March Joint Powers Authority[1], assumed 1999 date – last updated 2/17/2022 (General Plan, 1999)
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018

[1] https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf

- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

I-672.2

1. Critical Errors and Omissions in Section 4.8.

Polychlorinated biphenyls (PCBs)

Some background on the use and health effects of PCBs are described on page 455 (of 916) of the West Campus Upper Plateau Project Draft EIR (hereinafter referred to as Draft EIR), which states, “Polychlorinated biphenyls (PCBs) are organic oils that were formerly used primarily as insulators in many types of electrical equipment such as transformers and capacitors. After PCBs were determined to be carcinogenic in the mid-to-late 1970s, the EPA banned PCB use in most new equipment and began a program to phase out certain existing PCB-containing equipment (EPA 2021b). Fluorescent lighting ballasts manufactured after January 1, 1978, do not contain PCBs and are required to have a label clearly stating that PCBs are not present in the unit. PCBs are highly persistent in the environment, and exposure to PCBs has been demonstrated to cause cancer, as well as a variety of other adverse health effects on the immune system, reproductive system, nervous system, and endocrine system. The primary route of exposure to PCBs in the general population is the consumption of contaminated foods, particularly meat, fish, and poultry. Occupational exposure to PCBs occurs mainly through inhalation and dermal contact routes. According to the Phase I site assessment, the Project site includes pole-mounted electrical transformer banks east of Buildings 2 and 4 (Appendix J-1).”

The Draft EIR describes “PCBs – No detections in 38 of 39 samples with the one detection well below the regulatory screening level.” – page 455 (of 916)

I-672.3

Serious concerns include the limited scope of sampling and the sampling method as described below.

a. The scope of sampling is extremely limited.

As described in Appendix J-2 (page 27 of 656), “There are 42 pole-mounted transformers. There is also a black electrical wrap present on power feeds coming down off of pole-mounted transformers, and high-power lines, which may be wrapped with a PCB-containing product called Askerals. There are also 29 small capacitors on the ground inside and outside Building 5. It is recommended that each of these potential PCB-containing items be sampled in accordance with 40 CFR 761 to determine if they are PCB-containing as defined therein. If PCBs are identified in these features, it is further recommended that an assessment of nearby soils and/or hardscapes for PCBs be performed in accordance with the requirements set forth in 40 CFR 761.”

However, only 7 survey samples were collected and tested for PCBs from buildings 2 ,3 and 5 (Appendix J-2, page 24 of 656, Summary Results and Vista Environmental reports, pages 355

through 359, Attachment D in Appendix J-2, 3 for building 2; 2 for building 4; 3 for building 5). Especially for building 5, whereby 29 small capacitors were identified, only 3 wipe samples were collected on the concrete surface, according to the Vista Environmental report.

Considering the extremely limited sample survey, MJPA should, at a minimum, follow the cited recommendation and order soil tests around all 42 pole-mounted transformers and 29 small capacitors.

I-672.3 Cont.

b. Concerns with sample collection methods.

All the presented test results were from wipe tests from concrete surfaces, except one sample was from half metal and half concrete surfaces; however, according to the PCBs Question and Answer Manual (page 52, Q2) from the United States Environmental Protection Agency[2], wipe sample is only suitable for determining the PCB concentration of concrete that has been contaminated by a spill of PCBs less than 72 hours old (see §761.79(b)(4)). *For concrete contaminated by older spills, a bulk sample of the concrete must be analyzed to determine the PCB concentration.* This is critically important for determining the proper disposal of the concrete at these potentially contaminated sites, especially for building 5. *In addition, because of the porous nature of the concrete, the soil under the concrete should be sampled and tested to determine the proper mitigation measures.*

I-672.4

2. Comprehensive chemical testing is required for all the bunkers within a 0.25-mile radius of the Grove Community Church preschool and single-family homes.

As summarized in Table 6A of Appendix J-2 (page 24 of 656), only a very limited number of wipe samples have been taken from inside the bunkers. Considering the history of ammunition and chemical storage in these areas and the close proximity of many to the Grove Community Church preschool and single-family homes, comprehensive chemical testing of the concrete and the soil underneath is necessary to ensure that no hazardous aerosols are produced during demolition. Additional tests should be conducted for per-and polyfluoroalkyl substances (PFAS) and radioactive materials.

I-672.5

3. Decontamination plans and testing results after decontamination should be made available to the public for all detected contaminations (toxic metals and VOCs). This is critical for sites within a 0.25-mile radius of the Grove Community Church preschool and single-family homes to ensure the well-being of the children and residues.

I-672.6

[2] https://www.epa.gov/pcbs/polychlorinated-biphenyl-pcb-question-and-answer-manual-and-response-comment-documents

Sincerely,

Linlin Zhao
Riverside, CA 92508

Letter I-672

Linlin Zhao
March 8, 2023

I-672.1 This comment is introductory and refers to an attached comment letter. No further response is required.

I-672.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment notes the Project site is less than a quarter mile from the Grove Community Church preschool. The structures discussed in this comment letter are all in excess of a quarter mile from the Preschool. The Project proposes to retain and preserve in open space two weapons storage bunkers, including the one bunker within a quarter mile of the Preschool. This comment further details the commenter's background and materials reviewed.

I-673.3 The comment raises concerns with the scope of sampling conducted for polychlorinated biphenyl (PCB) containing materials. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, a Phase I Environmental Site Assessment (ESA) was performed by Leighton Consulting Inc. (Leighton) in 2021 and is included as Appendix J-1. The purpose of the Phase I ESA was to identify recognized environmental conditions (RECs), historical RECs (HRECs), or controlled RECs (CRECs) in connection with the Project Site. As such, the Phase I ESA was designed to assess whether soil or other additional testing is necessary to characterize the extent, if any, of contamination on the Project Site. As a result of the RECs identified in the Phase I, a Phase II ESA for the Project Site was performed by Leighton in 2022 (Appendix J-2) and included confirmation sampling activities, as recommended by the Phase I ESA. The PCB sampling conducted and described in the Draft EIR was the sampling as recommended by the Phase I ESA.

The Draft EIR explained that after testing was performed as part of the Phase II investigation [Refer to Form Letter D Response – Hazards, for details], supplemental PCB and Treated Wood Waste sampling performed by Vista Environmental Consulting (Vista) for Leighton (Leighton, 2022b), dated May 5, 2022 (PCB Report). This report was inadvertently left out of the Draft EIR and has been added as Appendix J-5. The comment raises concern that only three wipe samples were utilized to assess Building 5, where capacitors had been identified laying on the ground. As explained in the PCB Report, the capacitors are all one make and model, three samples of the subject capacitors were collected during the follow-on testing, and all of those samples were determined to not contain detectable levels of PCBs. The comment's recommendation concerning assessing the soil at the base of each power pole with a mounted transformer, cited the discussion of pole-mounted transformers and black electrical wrap in the initial testing report. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials, and the PCB Report attached as Appendix J-5, no PCB was detected in any of the samples collected of the black electrical wrap during the follow-on testing. Of the three randomly-selected transformers tested for PCB content, two resulted in "no PCBs detected" and one resulted in "1.5 mg/kg of Aroclor found," well below the 50 mg/kg standard of concern set forth in 40 CFR 761.

I-672.4 This comment questions the use of wipe sampling to assess the potential for PCB spills. Five exploratory trenches were completed during the Phase II investigation at two electrical substation areas which had

multiple former elevated electrical transformers (adjoining Building 2 and Building 4). Two exploratory trenches were also completed near pad-mounted transformers (adjoining Building 5 and at northeast edge of the Ordnance Storage Bunkers Area). The results of this investigation are as follows:

- Electrical Substation Areas (Building 2 and Building 4): No detected PCBs were reported in any of ten soil samples analyzed from this area, with the exception of one sample (ES1-3-2.5), which was reported to contain 0.009 mg/kg of only one isomer of PCB (i.e., PCB1254). This is below the 0.59 to 0.97 mg/kg DTSC and USEPA soil screening levels for soil in a commercial/industrial use scenario, and is also below the DTSC and USEPA soil screening level for residential use of 0.24 mg/kg.
- Pad Mounted Electrical Transformers (Building 5 and NE Edge of Ordnance Bunker Area): No detected PCBs were reported in any of six soil samples analyzed from this area.

DTSC, the expert agency in California that regulates hazardous wastes and materials "does not recommend sampling of building materials or surrounding media unless there is evidence of a PCB release that may lead to exposure."[2] As explained above, based on extensive testing, there is no evidence of a PCB release on the Project Site that may lead to exposure.

As explained in Vista Environmental Consulting Responses to Comments (Attachment A of Appendix J-6), as well as within Recirculated Section 4.8, Hazards and Hazardous Materials, in situations where it is known or expected that PCBs were present, the standard protocol would include the collection of concrete samples and even soil samples beneath the concrete. For example, this protocol would be used to assess the leakage of oil from a transformer that had been previously tested and determined to contain PCBs. There is no evidence of a leak containing PCBs anywhere within the Specific Plan area, therefore no sampling of the concrete, or any other building material is required.

The section of the Code of Federal Regulations cited by the commentor regarding wipe samples, Section 40 CFR 761.79(b)(4), applies to decontamination procedures after a known leak of PCBs. Had any detectable levels of PCBs been identified in any of the wipe samples that were collected, Vista would have recommended follow-on delineation sampling of the concrete or other substrate. However, the absence of PCBs in the wipe samples collected indicated that this step was unnecessary.

Despite the absence of PCBs in all samples collected, with the exception of one, which was still well below the regulatory level of concern, the Project is required to comply with MM-HAZ-1, which requires that all wastes be evaluated at the Project site for hazardous waste characterization and disposed of at an appropriately licensed disposal facility. Specifically, MM-HAZ-1 provides (in relevant part):

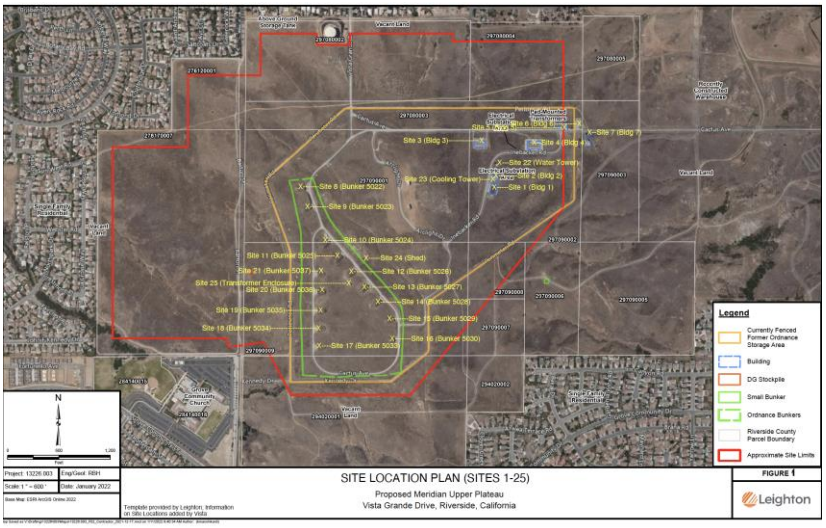
MM-HAZ-1. Abatement of Hazardous Building Materials. Prior to issuance of demolition or grading permits, the Project applicant shall submit documentation to the satisfaction of the March JPA that all recommendations from the January 17, 2022, Leighton Consulting Inc. Phase II Environmental Site Assessment for Meridian – West Campus Upper Plateau and the May 5, 2022, Leighton Consulting Inc. Hazardous Material (PCB/Treated Wood Waste) Investigation Report have been implemented at the Project site including but not limited to the following:

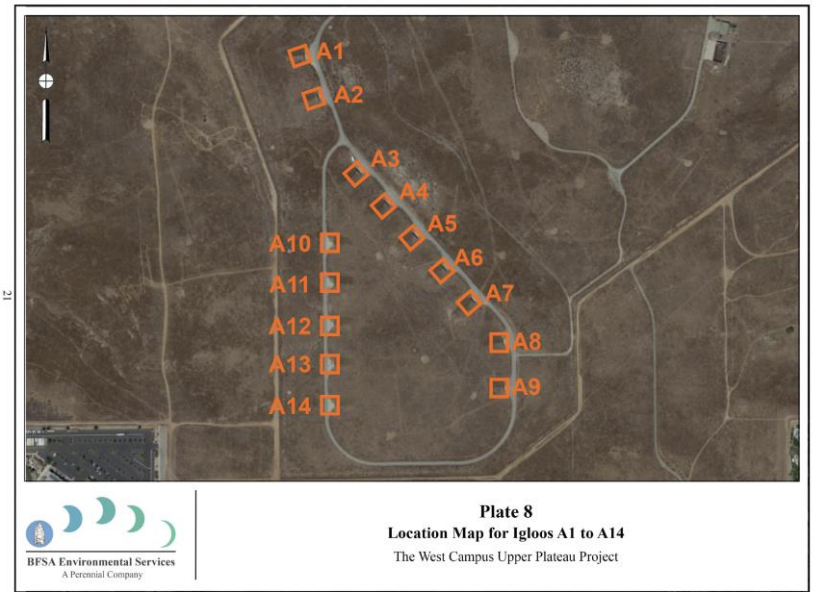
[2] DTSC, 2020, Human Health Risk Assessment Note Number 8: Recommendations for Evaluating Polychlorinated Biphenyls (PCBs) At Contaminated Sites in California

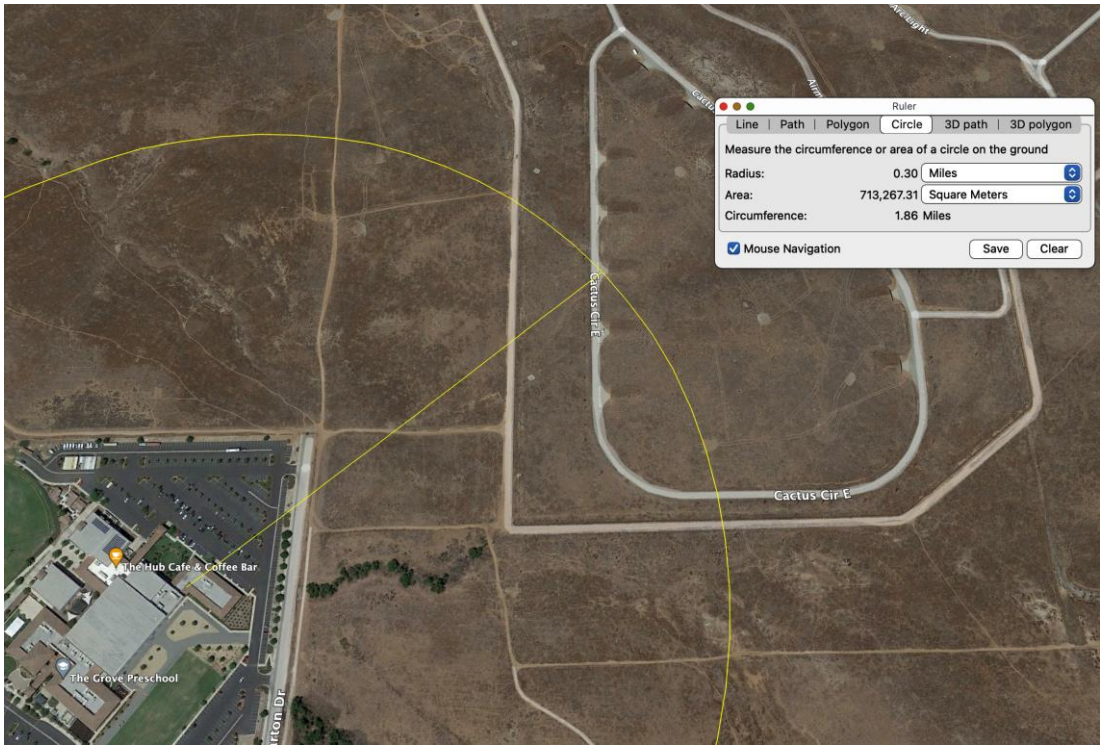
- The 42 pole-mounted transformers on site shall be disposed or recycled in accordance with 40 CFR 761 and accompanied by the findings of the April 26, 2022 sampling results including the one sample that showed the presence of Aroclor 1260 at a concentration of 1.5 milligrams per kilogram. In the event that during removal activities, transformer oil is identified or suspected in underlying soils, an assessment of nearby soils and/or hardscapes for PCBs shall be performed in accordance with the requirements set forth in 40 CFR 761.
- Applicable laws and regulations regarding the abatement and removal of asbestos containing materials, metals (cadmium, chromium and/or lead), mercury in light switches and fluorescent tubes, and lead-based paint shall be adhered to and implemented prior to demolition activities.
- Universal Waste Rule items shall be managed in accordance with applicable regulatory requirements.
- All wood poles found throughout the site shall be managed in accordance with California's Alternative Management Standards for treated wood waste consistent with California Health and Safety Code Sections 25230 through 25230.18.
- Evaluate various wastes identified at the site for hazardous waste characterization under California and RCRA standards for appropriate disposal to a licensed disposal facility.
- All ground disturbing activities shall be conducted by workers trained to look for any suspect contamination which can include odorous soils, soil staining, pipelines, underground storage tanks, or other waste debris. If encountered, earthwork activities shall cease until laboratory analysis of soil samples have been conducted and direction given from the Air Force and/or overseeing agency.

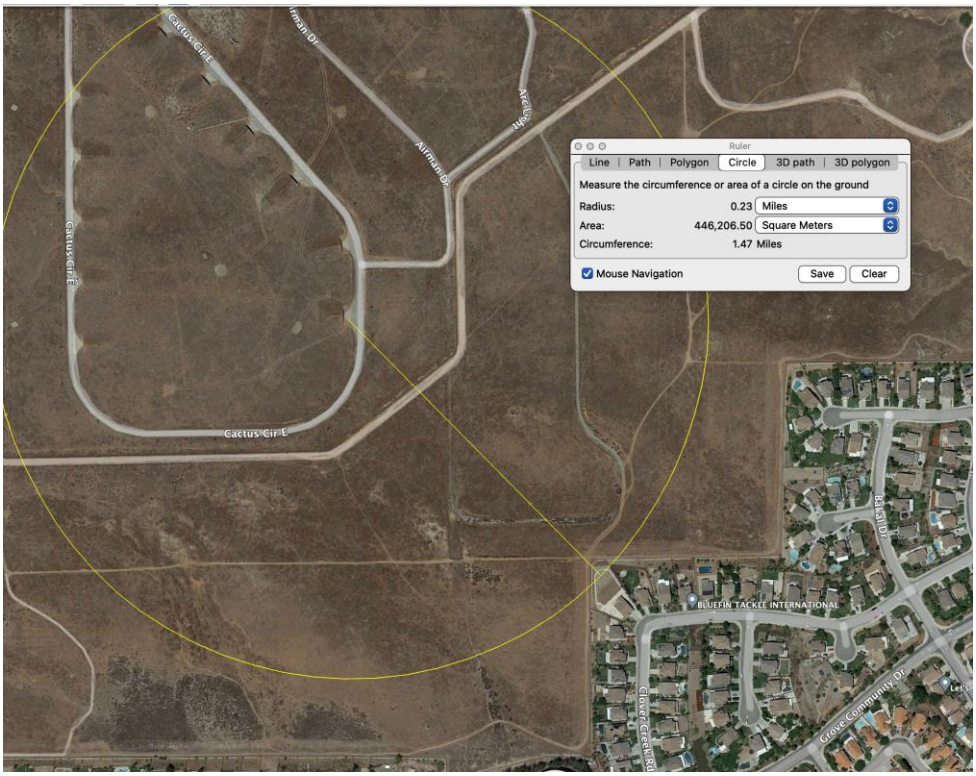
I-672.5 The comment states that chemical testing is required for all bunkers within a 0.25-mile radius of the Grove Community Church Preschool and single-family homes. None of the bunkers proposed for demolition are within a 0.25-mile radius of the Grove Community Church Preschool and as such, will not be disturbed. Consistent with the CEQA Guidelines Appendix G, Recirculated Section 4.8, Hazards and Hazardous Materials, analyzed hazards within 0.25 miles of a school.

As shown in the Figure below, bunkers A13 and A14 (also referred to as 5033 and 5034), the bunkers located closest to the Preschool, are the bunkers that will be retained for historical purposes within open space, as discussed in the Draft EIR. There is no similar radial threshold in the CEQA Guidelines Appendix G for single-family residential uses. As seen in the Figure below, the backyard of one residence is within 0.25 miles of bunker number A9 (5035) that will be demolished. As discussed further below and in Recirculated Section 4.8, Hazards and Hazardous Materials, the entire Weapons Storage Area, including the bunkers within a 0.25-mile radius of the Preschool and residential uses, has been cleared for unrestricted use in multiple documents from relevant regulatory agencies.


Legend
Currently Fenced Former Ordnance Storage Area
Building
DG Stockpile
Small Bunker
Ordnance Bunkers
Riverside County Parcel Boundary
Approximate Site Limits
SITE LOCATION PLAN (SITES 1-25)
Proposed Meridian Upper Plateau
Vista Grande Drive, Riverside, California
FIGURE 1
Leighton


A1
A2
A3
A4
A5
A6
A7
A8
A9
A10
A11
A12
A13
A14
BFSA Environmental Services
A Perennial Company
Plate 8
Location Map for Igloos A1 to A14
The West Campus Upper Plateau Project





Per the Final Comprehensive Site Evaluation Phase I Report prepared for the Military Munitions Response Program (2013, USAF MMRP), the Church, Preschool, and nearby residences are within a prior ammunition disposal area also known as the Demolition Area. The Demolition Area was addressed under the Formerly Used Defense Sites (FUDS) Program.

There is no evidence that PCBs were ever present in the bunkers. As outlined in the Phase I, Phase II, and the PCB Report, the PCB considerations on the Project Site revolve primarily around electrical equipment. In addition, the Phase I explicitly notes that "[n]o evidence of floor staining was observed in the bunkers, and the concrete flooring was noted to be in excellent condition." (Leighton, 2021). As such, there is no evidence or reason to believe that any PCB was released in the concrete bunkers.

With respect to PFAS, as detailed in Recirculated Section 4.8, Hazards and Hazardous Materials, the only place within the Specific Plan Area identified by the Air Force and all appropriate expert environmental agencies with the potential for PFAS contamination is the former Landfill No. 5 (Site 3).[3] The Air Force recently tested soils in the former Landfill No. 5 and found no detections of PFOA, PFOS, or PFBS above screening criteria. The Santa Ana Regional Water Quality Control Board concurred with the conclusion that no additional soil sampling is recommended in the former Landfill No. 5 area. Further, multiple documents from relevant regulatory agencies have cleared the Project site for unrestricted use, including the Santa Ana Regional Water Quality Control Board in 2006, which, responding to a site investigation, indicated that it concurred "with your finding of no release at the site, and the recommendation for no further action for the Weapons Storage Area." As such, no further remediation or removal activities are required. Please refer to Recirculated Section 4.8, Hazards and Hazardous Materials, and Topical Response 3 – Hazards, for further discussion of PFAS, radiological materials, and biological and chemical weapons.

I-672.6 The comment requests public disclosure of decontamination plans and testing results after decontamination. It is unclear as to what "decontamination plans" are being referenced, but assuming the commenter is referring to decontamination recommended in the Phase II, such decontamination, as indicated therein, will be conducted in compliance with the applicable state and federal regulations. Any asbestos or lead based paint requiring abatement will be mitigated by a licensed contractor, with oversight and clearance sampling by a licensed professional. A report on the abatement will then be issued. As discussed above, pursuant to MM-HAZ-1, wastes at the Project site must be evaluated for hazardous waste characterization and disposed of at an appropriately licensed disposal facility. MM-HAZ-1 also requires that all ground disturbing activities be conducted by workers trained to look for any suspect contamination, including odorous soils, soil staining, pipelines, underground storage tanks, or other waste debris. MM-HAZ-1 requires that documentation to the satisfaction of the JPA be submitted to verify compliance with this mitigation measure.

[3] AFCEC, 2022, Final Quality Program Plan (QPP) for the Remedial Investigation of Per- and Polyfluoroalkyl Substances (PFAS) at the Former March Air Force Base (AFB) and March Air Reserve Base (ARB), California; memorandum dated May 10, 2022.

From: Melody Clark <melodyeclark@icloud.com>
Sent: Wednesday, March 8, 2023 8:28 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
<include name, address, email in signature line>

Sent from my iPad

Letter I-673

Melody Clark
March 8, 2023

I-673.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: MJ Rivera <milo.rivera21052@gmail.com>
Sent: Wednesday, March 8, 2023 11:07 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation, and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Milo Rivera
922 Kilmarnock Way
Riverside, CA. 92508
milo.rivera21052@gmail.com

Letter I-674

Milo Rivera
March 8, 2023

I-674.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Steve Huddleston <shudd1217@charter.net>
Sent: Wednesday, March 8, 2023 1:21 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau Project

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Steve Huddleston
639 Burwood Ct.
Riverside CA 92506

shudd1217@charter.net

bcc: **rivnowgroup@gmail.com**

Letter I-675

Steve Huddleston
March 8, 2023

I-675.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Shaan Saigol <shaansaigol@gmail.com>
Sent: Wednesday, March 8, 2023 6:15 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As someone who commutes to LA, OC, and SD almost every day for work, I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built?

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Shaan Saigol
20872 Bakal Dr, Riverside 92508
shaansaigol@gmail.com

Letter I-676

Shaan Saigol
March 8, 2023

I-676.1 This comment letter is a slightly modified version of Form Letter G – Traffic where the commenter inserted the following phrase at the beginning of the second paragraph of the form letter: "As someone who commutes to LA, OC, and SD almost every day for work,…". The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter G Response.

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From: Sarah Williams <swill137@ucr.edu>
Sent: Wednesday, March 8, 2023 2:20 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year's timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. **Who will be tasked with enforcing mitigations for the habitat?** How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Sarah Williams
11819 Central Ave, apt 631

Chino, CA
swill137@UCR.edu

Letter I-677

Sarah Williams
March 8, 2023

I-677.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: CHRISTINE MARTIN <timnchrismartin@aol.com>
Sent: Wednesday, March 8, 2023 8:13 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

I-678.1

Please explain the weight given in the decision making process to an extensive and unanimous opposition to the plan communicated so clearly and in different forums by those who will be most impacted by the West Campus Upper Plateau warehouse project. What value is assigned to the desires of the community and how does it inform the decision being made by JPA?

I-678.2

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

I-678.3

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996,

p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

I-678.3 Cont.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Tim Martin
timnchrismartin@aol.com
5933 Shaker Dr.
Riverside, CA. 92506

Letter I-678

Tim Martin
March 8, 2023

I-678.1 This comment is the same as the first three paragraphs of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-678.2 This comment asks what weight community comments are given in the decision making process. This comment does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. As such, no further response is provided. In response to this question, every single comment letter and comment submitted during the public review period for the Draft EIR is included within, and responded to, in the Final EIR. Therefore, the opposition expressed by the community about the proposed Project is included within and provided to decision makers as part of this Final EIR.

I-678.3 This comment is the same as the remainder of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: CHRISTINE MARTIN <timnchrismartin@aol.com>
Sent: Wednesday, March 8, 2023 8:15 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Tim Martin
timnchrismartin@aol.com
5933 Shaker Dr.
Riverside, CA. 92506

Letter I-679

Tim Martin
March 8, 2023

I-679.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: nora jones <jnora893@gmail.com>
Sent: Wednesday, March 8, 2023 12:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Victoria Belova
8260 Gardenia Vista Rd Riverside Ca 92508 Jnora893@gmail.com

Sent from my iPhone

Letter I-680

Victoria Belova
March 8, 2023

I-680.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Ying Shen <yingyingshen@hotmail.com>
Sent: Wednesday, March 8, 2023 6:41 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Yueqiu Zhou
8320 Clover Creek Rd.
Riverside CA 92508
yingyingshen7@gmail.com

Letter I-681

Yueqiu Zhou
March 8, 2023

I-681.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Thursday, March 9, 2023 11:22 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; Kevin Jeffries; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission on this email.

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For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for

youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

2. Alternate plan #2: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

3. Alternate plan #3: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

Thank you for allowing me to provide comments on this project.

Sincerely,

ann.marchand1@gmail.com

Ann & Dolores Marchand
6193 Academy Avenue
Riverside CA 92506

Letter I-682

Ann and Dolores Marchand
March 9, 2023

I-682.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Anza Akram <basiqs06@gmail.com>
Sent: Thursday, March 9, 2023 2:01 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Anza Akram
6752 Ridgeside Dr.,

Letter I-683

Anza Akram
March 9, 2023

I-683.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Anza Akram <basiqs06@gmail.com>
Sent: Thursday, March 9, 2023 2:04 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Anza Akram
6752 Ridgeside Dr.,
Riverside, 92506

Letter I-684

Anza Akram
March 9, 2023

I-684.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Abby Banning <h2oabby@gmail.com>
Sent: Thursday, March 9, 2023 12:52 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Letter I-685

Abigail Banning
March 9, 2023

I-685.1 This comment letter is Form Letter H –Alternatives. As such, in response to this comment, please see Topical Response 8 – Alternatives.

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From: Abby Banning <h2oabby@gmail.com>
Sent: Thursday, March 9, 2023 12:53 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Abigail Banning 19138 Broken Bow Drive 92508 h2oabby@gmail.com

Letter I-686

Abigail Banning
March 9, 2023

I-686.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Abby Banning <h2oabby@gmail.com>
Sent: Thursday, March 9, 2023 12:53 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Abigail Banning 19138 Broken Bow Drive 92508 h2oabby@gmail.com

Letter I-687

Abigail Banning
March 9, 2023

I-687.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Abby Banning <h2oabby@gmail.com>
Sent: Thursday, March 9, 2023 12:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Abigail Banning 19138 Broken Bow Drive 92508 h2oabby@gmail.com

Letter I-688

Abigail Banning
March 9, 2023

I-688.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Abby Banning <h2oabby@gmail.com>
Sent: Thursday, March 9, 2023 12:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Abigail Banning 19138 Broken Bow Drive 92508 h2oabby@gmail.com

Letter I-689

Abigail Banning
March 9, 2023

I-689.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Abby Banning <h2oabby@gmail.com>
Sent: Thursday, March 9, 2023 12:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Abigail Banning 19138 Broken Bow Drive 92508 h2oabby@gmail.com

Letter I-690

Abigail Banning
March 9, 2023

I-690.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Abby Banning <h2oabby@gmail.com>
Sent: Thursday, March 9, 2023 12:55 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Abigail Banning 19138 Broken Bow Drive 92508 h2oabby@gmail.com

Letter I-691

Abigail Banning
March 9, 2023

I-691.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Abby Banning <h2oabby@gmail.com>
Sent: Thursday, March 9, 2023 12:55 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Abigail Banning 19138 Broken Bow Drive 92508 h2oabby@gmail.com

Letter I-692

Abigail Banning
March 9, 2023

I-692.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Adolfo Jimenez <ucrfito@yahoo.com>
Sent: Thursday, March 9, 2023 12:18 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email. Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant. 1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement. · Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. · Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan). · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in

education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County. 2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park. · Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. · Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB. · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB. 3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA). · Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire. · Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5. · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities. These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area. Thank you for allowing me to provide comments on this project.

Sincerely,
Adolfo Jimenez

Letter I-693

Aldofo Jimenez
March 9, 2023

I-693.1 This comment letter is Form Letter H –Alternatives. As such, in response to this comment, please see Topical Response 8 – Alternatives.

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From: peasleeamber <peasleeamber@gmail.com>
Sent: Thursday, March 9, 2023 6:42 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

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1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

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3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Letter I-694

Amber Peaslee
March 9, 2023

I-694.1 This comment letter is Form Letter H –Alternatives. As such, in response to this comment, please see Topical Response 8 – Alternatives.

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From: Amber Peaslee <peasleeamber@gmail.com>
Sent: Thursday, March 9, 2023 11:39 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
Amber Peaslee
92508
peasleeamber@gmail.com

Letter I-695

Amber Peaslee
March 9, 2023

I-695.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Amber Peaslee <peasleeamber@gmail.com>
Sent: Thursday, March 9, 2023 11:45 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

I-696.1

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

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

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

My family and I have noticed the overwhelming amount of semi-trucks cutting through Orange crest and Woodcrest using Van Buren which is damaging our roads! We absolutely hate the increased amount of traffic we now experience due to truck drivers who don't abide by the law. It is even more upsetting to see that the agreed-upon paths are not strictly enforced! Where is the accountability? I-696.2

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. I-696.3

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Amber Peaslee
92508
peasleeamber@gmail.com

Letter I-696

Amber Peaslee
March 9, 2023

I-696.1 This comment is the same as Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-696.2 This comment expresses concern about trucks on residential streets and lack of enforcement. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. No changes or revisions to the EIR are required in response to this comment.

I-696.3 This comment is the same as the last two paragraphs of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Amber Peaslee <peasleeamber@gmail.com>
Sent: Thursday, March 9, 2023 11:45 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

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The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Amber Peaslee
92508
peasleeamber@gmail.com

Letter I-697

Amber Peaslee
March 9, 2023

I-697.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Amber Peaslee <peasleeamber@gmail.com>
Sent: Thursday, March 9, 2023 11:45 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

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As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,
Amber Peaslee
92508
peasleeamber@gmail.com

Letter I-698

Amber Peaslee
March 9, 2023

I-698.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Amber Peaslee <peasleeamber@gmail.com>
Sent: Thursday, March 9, 2023 11:46 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Amber Peaslee
92508
peasleeamber@gmail.com

Letter I-699

Amber Peaslee
March 9, 2023

I-699.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Amber Peaslee <peasleeamber@gmail.com>
Sent: Thursday, March 9, 2023 11:46 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Amber Peaslee
92508

peasleeamber@gmail.com

Letter I-700

Amber Peaslee
March 9, 2023

I-700.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Amber Peaslee <peasleeamber@gmail.com>
Sent: Thursday, March 9, 2023 12:00 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

I-701.1

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

I-701-1 Cont.

I grew up down the freeway in Perris, near Mead Valley. The warehouses that have sprung up like weeds over the last several years have truly been a disgusting example of how those in power with money will easily prey on those who don't know better. The people I grew up with didn't have the resources they needed to understand that they had a voice about the warehouses that were built right in their backyard. As an RNOW member myself, I will fight for my neighborhood, my future, and my family. You may intimidate others who do not know better but this community has done its homework; we are thoroughly prepared and we will not be subdued by ill-supported "facts" and promises.

I-701.2

Sincerely,
Amber Peaslee
92508
peasleeamber@gmail.com

Letter I-701

Amber Peaslee
March 9, 2023

I-701.1 This comment is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-701.2 This comment expresses general opposition to warehouses as well as the proposed Project. The comment does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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From: aramjim09@gmail.com
Sent: Thursday, March 9, 2023 6:32 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Ana Ramirez

Letter I-702

Ana Ramirez
March 9, 2023

I-702.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: ANTHONY SCIMIA JR <tscimia@sbcglobal.net>
Sent: Thursday, March 9, 2023 7:05 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

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medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Anthony Scimia Jr

Letter I-703

Anthony Scimia Jr
March 9, 2023

I-703.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Ajay Shah <ajayatsc@yahoo.com>
Sent: Thursday, March 9, 2023 8:09 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email. Please build more parks and no more warehouses.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

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· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Ajay Shah
Orangecrest Neighborhood

Letter I-704

Ajay Shah
March 9, 2023

I-704.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Andrea Lynn Wood <andrea.wood@ucr.edu>
Sent: Thursday, March 9, 2023 6:32 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
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medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
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· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
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· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
ANDREA WOOD
Riverside, CA 92521

Letter I-705

Andrea Wood
March 9, 2023

I-705.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Thursday, March 9, 2023 9:20 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the West Campus Upper Plateau. I am in favor of each of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you,

Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-706

Aaron Bushong
March 9, 2023

I-706.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Thursday, March 9, 2023 9:32 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Over the past 23 years, the March JPA has never meaningfully engaged with the community, has never formed a community advisory board to guide their development decisions, and has never pursued a project that respects the safety, well-being, and quality of life of residents. Instead, the March JPA has ignored the concerns of the community and hidden from scrutiny by withholding information from the community and scheduling meetings in the middle of the day when most community members are unable to attend. I-707.1

Ignoring the concerns and opposition of the community has resulted in, among other disasters, an airplane crashing into a warehouse, a warehouse fire, and a jack-knifed big rig on a residential street that stopped traffic for 45 minutes, each of which put residents in danger, and all three of which were the result of the lack of foresight and utter disregard for residents' safety and well-being demonstrated by the March JPA. The proposed West Campus Upper Plateau project will only increase the possibility of similar disasters and place them even closer to residential homes.

I demand that the developer specifically address how big rigs will be strictly prohibited from using residential streets in perpetuity and how airplane crashes and warehouse fires will be guaranteed never to occur again. If the developer is unable to meet those demands, the project should not be allowed to proceed. I-707.2

Thank you,
Aaron Bushong
8562 Orchard Park Drive
Riverside, CA 92508
aaron.bushong@verizon.net

Letter I-707

Aaron Bushong
March 9, 2023

I-707.1 This comment raises concerns regarding March JPA's public engagement regarding development decisions. March JPA is a public agency that holds public meetings that are noticed and open to the public. Regarding this Project, March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR.

I-707.2 This comment questions how big rigs will be restricted from traveling on residential streets in perpetuity. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway.

Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

This comment further questions how airplane crashes and warehouse fires can be guaranteed to never occur again. Warehouse fires caused by airplane crashes are an anomaly and rarely occur. However, given the Project's proximity to the March Inland Port Airport, the risk of airplane crashes remains. The Riverside County Airport Land Use Commission (ALUC) reviews projects to maximize consistency with airport land use plans for projects within close proximity to an active airstrip. This Project has undergone review by ALUC, as discussed in Recirculated Section 4.10, Land Use and Planning. ALUC provided their consistency determination in a letter dated May 16, 2022, which is included within Appendix L of the Draft EIR.

Additionally, as detailed in Recirculated Chapter 3, Project Description, and Topical Response 6 – Meridian Fire Station, the Project will construct the new Riverside County fire station at Meridian

Parkway and Opportunity Way. The provision of a new fire station within the Meridian Business Park will allow for more rapid response to any potential future warehouse fire. Given existing fire mutual aid agreements serving March JPA, the Project site would be adequately served by fire protection services through the buildout of the Specific Plan. In addition, Section 4.18, Wildfire, includes mitigation measures to help reduce wildfire-related impacts, such as MM-FIRE-1 (Pre-Construction Requirements). This measure would also help reduce impacts to fire protection services, as detailed in Section 4.13, Public Services. Moreover, the Project includes PDF-FIRE-1 through PDF-FIRE-3 which would ensure compliance with the California Fire Code, implementation of a fire protection plan, and educational materials on evacuation and wildfire risk. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Finally, MM-FIRE-2 would implement vegetation management measures and MM-FIRE-3 would require compliance with the Fuel Management Zone protections related to alternative materials and methods.

It is beyond the scope of this Project and Draft EIR to guarantee that airplane crashes and warehouse fires will never occur again; however, the analysis within the Draft EIR, the consistency with the airport land use plan, and the buildout of the new Meridian Fire Station would minimize potential impacts to the Project site and surrounding communities in the event of another catastrophic event. No changes or revisions to the EIR are required in response to this comment.

From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 9:39 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and demand that the project applicant be required to make every effort to preserve endangered and threatened wildlife and plant-life in the area.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? The final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant-life

1. Why is the coastal scrub documented in some parts of the DEIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant-life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why was the plant survey conducted during a drought year? How can the DEIR claim it is absent or assess the significance of impact unless its absence has been documented during a year and season of normal rainfall, when the rare plant life would be able to grow?

Given these deficiencies, I demand that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also demand that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that the project will not be destroying rare plant life unless a more thorough survey is conducted.

Finally, I demand that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can the public be assured that these mitigation measures will be enforced?

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-708

Allison Bushong
March 9, 2023

I-708.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 9:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section are highly disconcerting. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than diesel particulate matter will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous military use of the project construction area.

Please specifically address the following items:

1. How did you determine which chemicals to test for and which to omit? Why was diesel particulate matter the only substance considered in the "Human Risk Assessment" section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the weapons bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long timeframe since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I demand that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any others that may have been stored in the weapons bunkers. I also demand that you share with the public all information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil will be treated, given its high concentration.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health, and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I demand that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issuance of demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, those materials must be completely removed.

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-709

Allison Bushong
March 9, 2023

I-709.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 9:46 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am appalled that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses, as long as they are low-density. Please specify what other land uses C-2 zoning allows and why they are not being pursued.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on three sides by residential homes, and that residents have submitted over 2,500 signatures, hundreds of emails, and scores of comments at public meetings opposing the project, how is that feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how can the utter disregard for the community opposition in relation to the reuse plan policies be justified?

In the General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions**"** and **"**Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air-quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways has Community Preference been incorporated in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for "Industrial/Warehousing" uses and it explicitly shows "Industrial/Warehousing" land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as a Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 states,

> The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space. When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to "up zone" the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, the March JPA is obligated to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-710

Allison Bushong
March 9, 2023

I-710.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 9:48 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The traffic section of the document presents serious concerns. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project, and the project's own traffic estimates indicate that approximately 20,000 additional trips will use the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in the analysis, especially when considering that the traffic analysis fails to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. The traffic sections also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How can the analysis justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did the analysis exclude known construction projects that have already been permitted to be built?

I demand the traffic section be updated to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable.

How traffic will affect our arterial streets is another major concern. The analysis assumes drivers will use approved paths, but it is clear from experience this is not the case. For instance, on February 2, a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety.

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

I demand that the traffic study be updated to reflect the actual conditions of the surrounding area.

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-711

Allison Bushong
March 9, 2023

I-711.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 9:50 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air-quality impacts on surrounding residents. However, beyond that admission, there are numerous deficiencies in the analysis, and it underestimates the air-quality impacts.

The analysis does not consider the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. I demand that these impacts be included in both the local and regional analysis for the final EIR. The analysis also fails to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. The air-quality and health-risk assessment must be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, the project applicant must apply the conservative AQMD Rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, it is important to be more conservative in truck trip rate projections. Using the Rule 2305 numbers would almost double the daily truck trips.

Also, the March JPA has a responsibility to mitigate significant impacts on the surrounding community. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Why were such mitigations not considered in the DEIR for this site?

Significant mitigations must be put in place to reduce the impact on local residents:

1) Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2) Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

The impact on air quality must also be mitigated by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least that can be done to protect the surrounding community. California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning. A minimum of 50% of delivery vehicles must be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. 30% of trucks must also be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I demand that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will the March JPA assure adjacent residents that their interests will be protected?

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-712

Allison Bushong
March 9, 2023

I-712.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 9:52 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-713.1

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How was that number calculated? On what evidence was it based? There is no analysis in the DEIR to justify the number of jobs. Please provide a detailed, evidence-based analysis justifying the number of jobs. I-713.2

The Greenhouse Gas (GHG) section claims that the development will have a net positive effect because local community members will have less of a commute driving to work. No one with a temporary, part-time, and/or low-paying warehouse job will be able to afford to live anywhere within the surrounding community? On what data was the assumption that local residents need or desire low-paying warehouse jobs based? What data was used to calculate the vehicle miles travelled? How were the traffic models that assume 21-mile commutes would be shortened to 16-mile commutes created? Please justify the assertions by providing data detailing the mean, median, and mode monthly salary of the jobs that will be created and the mean, median, and mode monthly rent/mortgage in the surrounding communities. It is clear that the job and greenhouse gas assumptions are wildly inaccurate. I-713.3

Moreover, the cumulative impact of approved and planned warehouses already in the region far exceeds the number of available employees in the region. The current unemployment rate is at a 50-year low, and there are over 4,000 acres of approved and planned warehouses along the 215/60 corridor. At 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318,000 in Riverside, 212,000 in Moreno Valley, 80,000 in Perris, and 20,000 in Mead Valley). There are about 300,000 people in the labor force (For those aged 16+, the labor force participation rate is 62%.). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work in warehouses. Assuming that 50% can work in warehouses, that still leaves well over 20,000 jobs to be filled. The population growth (<1% per year) in our region is I-713.4

not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support any additional warehouse jobs. The only way to fill those jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the vehicle miles travelled per employee estimates indicating shorter commutes are incorrect. This project will further exacerbate housing stress by requiring workers to commute from well outside of a 15-mile radius of the project. Even if allowed for the faulty assumption that locals would commute to the site, how would the analysis change if one accounts for automation in warehouses, or the fact that Californians are required to purchase electric vehicles by 2035? Please justify the current vehicle miles travelled per employee estimates using actual job, population, and housing estimates from the last three months, rather than seven-year-old SCAG projections that are completely incorrect.

I-713.4 Cont.

It is obvious that the region does not have the capacity to staff these warehouses locally. Please consider more appropriate alternatives for the project, such as single-family residential homes that would actually serve to improve the real-world jobs-to-housing imbalance. Housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-713

Allison Bushong
March 9, 2023

I-713.1 This comment is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 9:54 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-714.1

The project site comprises approximately 817.9 acres within the western portion of the March JPA planning sub-area (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and the City of Moreno Valley.

The zoning designation in the DEIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities, but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have, including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant?" Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. The March JPA must demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here. Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-714.2

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the

March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? Furthermore, the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. The Aesthetics section must be revised, so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Images that reflect the actual appearance of warehouses in the area must also be used. Otherwise, the images and the Aesthetics section are a lie and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond the visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which have been identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of Western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. The March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large, industrial, mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal, low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan, and the community demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. They also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered, and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Do not allow one final, grand act of poor land use planning to be the lasting legacy of the March JPA.

I-714.2 Cont.

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-714

Allison Bushong
March 9, 2023

I-714.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment also raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8 - Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

I-714.2 This comment is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 9:59 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I have lived in the same house in the Orangecrest neighborhood for 23 years. During that time, I have joined my neighbors in attempting to work with the March Joint Powers Authority on responsible planning for the 4,400 acres of surplus property. My neighbors and I worked to oppose the DHL cargo facility in the early aughts. We were ignored, and DHL failed within four years. My neighbors and I have worked over the past 15 years to oppose the development along Meridian Parkway and Van Buren Boulevard. We have been ignored, and one merely needs to drive those roads to see the numerous unoccupied, nondescript, and/or anemic buildings, many of which have remained vacant since they were built.

I-715.1

The March Joint Powers Authority has demonstrated its poor planning, lack of foresight, and utter disregard for Riverside residents' well-being and safety for at least the past 23 years. The West Campus Upper Plateau Project is only the most recent misguided and uninformed project that, similar to past projects, will be detrimental to the quality of life for local residents.

Riverside consistently ranks near the top of any list of cities in California in terms of pollution and traffic congestion. The West Campus Upper Plateau Project will only exacerbate the pollution and traffic congestion in Riverside. I demand that the developer revise the entire project to include non-industrial alternatives, as has been consistently requested by the community for over a year.

I-715.2

I-715.3

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-715

Allison Bushong
March 9, 2023

I-715.1 This comment expresses opposition to the development of industrial projects within the March JPA Planning Area, including the proposed Project. The comment raises concerns regarding vacancies in area warehouses. According to Table 1 of the draft "Economic Impact Analysis of the March Joint Powers Authority (MJPA) Development Projects" by Dr. Qisheng Pan presents 2023 employment data for the various existing developments within the March JPA Planning Area (Final EIR Appendix U), there are few vacancies within the March JPA Planning Area. The comment does not raise any specific issues, questions or concerns regarding the adequacy of the environmental analysis in the Draft EIR.

I-715.2 This comment raises general concerns regarding the Project's impacts to existing air quality and traffic conditions. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

I-715.3 This comment requests consideration of a non-industrial alternative. In response to this comment, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 10:01 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I have lived in the Orangecrest neighborhood since March of 2000. Over the past 23 years, I have experienced the same deception and lies from the March JPA as are presented in the draft environmental impact report: lies about jobs that don't pay enough for employees to even live in the City of Riverside and that, with automation, will soon be obsolete; lies about parks, trails, and open spaces that never come to fruition; and lies about construction, an abundance of which is currently vacant and has never been occupied. Those lies have systematically transformed one of the most desirable and attractive residential neighborhoods in the City of Riverside into a sea of unsightly office buildings and warehouses that are inconsistent with responsible city planning. The March JPA is using the same tactics to promote the West Campus Upper Plateau Project.

I-716.1

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in that document. They also have a duty to work with local communities to develop the West Campus Upper Plateau in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project must be reconsidered, and reasonable alternative configurations must be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come.

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-716

Allison Bushong
March 9, 2023

I-716.1 This comment expresses general opposition to the Project and does not raise any specific issues, questions or concerns about the analysis in the Draft EIR. Regarding automation, while existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use. The Project Development Agreement includes up to $3.5 million for the construction of the Park.

This comment further states that March JPA and the Applicant have a duty to adhere to the March ARB General Plan and engage the local communities and municipalities. It should be noted that the March Air Reserve Base does not have an adopted General Plan. The Project's consistency with the goals and policies of the March JPA General Plan is included in Recirculated Section 4.10, Land Use and Planning. March JPA and the Applicant conducted multiple public outreach efforts including three community meetings, two Technical Advisory Committee workshops, and one Zoom virtual presentation. Using a radius of 2,000 feet around the perimeter of the Project site, March JPA distributed 2,172 public notices. March JPA engaged with local jurisdictions and service providers (see, e.g., the traffic scoping agreement in Appendix N-2).

This comment requests consideration of alternatives to reduce aesthetic impacts. CEQA Guidelines Section 15126.6(f) provides that "[t]he range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project." As examined in Section 4.1, Aesthetics, of the Draft EIR and Topical Response 1 - Aesthetics, the EIR has disclosed the Project's aesthetic impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be less than significant with implementation of PDF-AES-1 through PDF-AES-16 and MM-AES-1 through MM-AES-3. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. As such, the reduction of aesthetic impacts would not be a required priority in the selection of a reasonable range of alternatives to the Project. The alternatives presented in Chapter 6, Alternatives, of the Draft EIR, have all been evaluated for potential aesthetic impacts. Similar to the analysis included in Section 4.1, Aesthetics, consideration of visual changes to publicly available views of the Project site were considered. Alternative 2 (Reduced Development) and Alternative 4 (Reduced Cultural Resource Impact) were determined to have reduced aesthetics impacts compared to the Project. Topical Response 8 – Alternatives, presents and analyzes Alternative 5 – Non-Industrial Alternative, determining its aesthetic impacts would be reduced compared to the Project's.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 10:03 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

What do an airplane crashing into a warehouse, a warehouse fire, and a jack-knifed big rig on a residential street that stopped traffic for 45 minutes have in common? They all occurred in the Orangecrest neighborhood of Riverside within the past three years, with the warehouse fire and jack-knifed big rig both occurring on September 12 of this year; all three put local residents in danger; and all three were the result of the poor planning, lack of foresight, and utter disregard for local residents' well-being and safety demonstrated by the March Joint Powers Authority for at least the past 23 years. The West Campus Upper Plateau Project is only the most recent misguided and uninformed project that, similar to past projects, will be detrimental to the quality of life for Riverside, Perris, and Moreno Valley residents.

Riverside consistently ranks near the top of any list of cities in California in terms of pollution and traffic congestion. If you have any doubts about that you should contact the California Air Resources Board on Iowa Avenue in Riverside or the College of Engineering Center for Environmental Research and Technology at UC Riverside, rather than relying on the biased environmental impact report that the developer clearly paid to be written in their favor. If the project is approved, the traffic and pollution problems will most certainly worsen, and they won't be localized to the City of Riverside. The City of Perris and the City of Moreno Valley will necessarily experience the detrimental impacts, as well.

I demand that the developer specifically address how traffic and pollution problems will be mitigated, how big rigs will be strictly prohibited from using residential streets in perpetuity, and how airplane crashes and warehouse fires can be guaranteed never to occur again. If the developer is unable to meet any of those demands, the project should not be allowed to proceed.

I-717.1

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-717

Allison Bushong
March 9, 2023

I-717.1 This comment is the same as Comment Letter I-653. Please see Response I-653.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 10:05 AM
To: Dan Fairbanks
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan, you have ignored the community, and it seems you did so intentionally. For twelve months, we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and other sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area, and I have serious concerns with the lack of alternate plans in the DEIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the West Campus Upper Plateau. I am in favor of each of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you,

Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-718

Allison Bushong
March 9, 2023

I-718.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Aaron Bushong <bushongucr@gmail.com>
Sent: Thursday, March 9, 2023 10:06 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Over the past 23 years, the March JPA has never meaningfully engaged with the community, has never formed a community advisory board to guide their development decisions, and has never pursued a project that respects the safety, well-being, and quality of life of residents. Instead, the March JPA has ignored the concerns of the community and hidden from scrutiny by withholding information from the community and scheduling meetings in the middle of the day when most community members are unable to attend.

Ignoring the concerns and opposition of the community has resulted in, among other disasters, an airplane crashing into a warehouse, a warehouse fire, and a jack-knifed big rig on a residential street that stopped traffic for 45 minutes, each of which put residents in danger, and all three of which were the result of the lack of foresight and utter disregard for residents' safety and well-being demonstrated by the March JPA. The proposed West Campus Upper Plateau project will only increase the possibility of similar disasters and place them even closer to residential homes.

I-719.1

I demand that the developer specifically address how big rigs will be strictly prohibited from using residential streets in perpetuity and how airplane crashes and warehouse fires will be guaranteed never to occur again. If the developer is unable to meet those demands, the project should not be allowed to proceed.

Thank you,
Allison Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushongucr@gmail.com

Letter I-719

Allison Bushong
March 9, 2023

I-719.1 This comment is the same as Comment Letter I-707. Please see Response I-707.

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From: Amisha Shah <amiaj2008@gmail.com>
Sent: Thursday, March 9, 2023 8:20 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-720.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-720.1 Cont.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Amisha Shah
8301 Clover Creek Rd
Riverside, CA 92508
amiaj2008@gmail.com

Letter I-720

Amisha Shah
March 9, 2023

I-720.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Thursday, March 9, 2023 10:40 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email. Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant. 1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement. · Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. · Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan). · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County. 2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the

I-721.1

Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park. · Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. · Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB. · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB. 3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA). · Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire. · Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5. · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities. These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area. Thank you for allowing me to provide comments on this project.

I-721.1 Cont.

Sincerely,
Bobby Robinette
8370 Orchard Park Drive, 92508
Bobbyelden@yahoo.com

Letter I-721

Bobby Robinette
March 9, 2023

I-721.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Brian Wardle <wardleb@gmail.com>
Sent: Thursday, March 9, 2023 8:37 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-722.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

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· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

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· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

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I-722.1 Cont.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Brian Wardle
Orangecrest Neighborhood
Riverside, 92508

Letter I-722

Brian Wardle
March 9, 2023

I-722.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Candy Blokland <blokland@yahoo.com>
Sent: Thursday, March 9, 2023 11:01 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

I-723.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

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I-723.1 Cont.

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Candy Blokland
7689 Sea Vista Drive
Riverside CA 92508
951.789.7237

Letter I-723

Candy Blokland
March 9, 2023

I-723.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Chris Hannon <chrishannon25@gmail.com>
Sent: Thursday, March 9, 2023 10:23 AM
To: Dan Fairbanks
Cc: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email. Your consideration and implementation of one of these alternative plans would insure, for coming generations, a positive and beneficial effect on the surrounding communities as well as a path away from the industrialization of our community. You and your decisions would be remembered for giving back to the community.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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I-724.1

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· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
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I-724.1 Cont.

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Thank you for allowing me to provide comments on this project.

Sincerely,
Chris Hannon
2647 Victoria Park Drive
Riverside 92506
Chrishannon25@gmail.com

Letter I-724

Chris Hannon
March 9, 2023

I-724.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Cindy Jessen <cjessen022@gmail.com>
Sent: Thursday, March 9, 2023 7:43 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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Thank you for allowing me to provide comments on this project.

Sincerely,

Cynthia Jessen
8768 Senna Ln, Riverside, CA 92508
email: cjessen022@gmail.com

Letter I-725

Cynthia Jessen
March 9, 2023

I-725.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Cindy Jessen <cjessen022@gmail.com>
Sent: Thursday, March 9, 2023 7:44 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
Cynthia Jessen
8768 Senna Ln, Riverside, CA 92508
email: cjessen022@gmail.com

Letter I-726

Cynthia Jessen
March 9, 2023

I-726.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Cindy Jessen <cjessen022@gmail.com>
Sent: Thursday, March 9, 2023 7:44 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Cynthia Jessen
8768 Senna Ln, Riverside, CA 92508
email: cjessen022@gmail.com

Letter I-727

Cynthia Jessen
March 9, 2023

I-727.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Cindy Jessen <cjessen022@gmail.com>
Sent: Thursday, March 9, 2023 7:45 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Cynthia Jessen
8768 Senna Ln, Riverside, CA 92508
email: cjessen022@gmail.com

Letter I-728

Cynthia Jessen
March 9, 2023

I-728.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Cindy Jessen <cjessen022@gmail.com>
Sent: Thursday, March 9, 2023 7:45 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,
Cynthia Jessen
8768 Senna Ln, Riverside, CA 92508
email: cjessen022@gmail.com

Letter I-729

Cynthia Jessen
March 9, 2023

I-729.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Cindy Jessen <cjessen022@gmail.com>
Sent: Thursday, March 9, 2023 7:45 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Cynthia Jessen
8768 Senna Ln, Riverside, CA 92508
email: cjessen022@gmail.com

Letter I-730

Cynthia Jessen
March 9, 2023

I-730.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Cindy Jessen <cjessen022@gmail.com>
Sent: Thursday, March 9, 2023 7:45 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Cynthia Jessen
8768 Senna Ln, Riverside, CA 92508

email: cjessen022@gmail.com

Letter I-731

Cynthia Jessen
March 9, 2023

I-731.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Cindy Jessen <cjessen022@gmail.com>
Sent: Thursday, March 9, 2023 7:45 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Cynthia Jessen
8768 Senna Ln, Riverside, CA 92508
email: cjessen022@gmail.com

Letter I-732

Cynthia Jessen
March 9, 2023

I-732.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: christine martin <cmcelsemartin@gmail.com>
Sent: Thursday, March 9, 2023 7:45 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-733.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-733.1 Cont.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Christine M.Clese Martin
5933 Shaker Drive
Riverside, CA 92506
cmcelsemartin@gmail.com

Letter I-733

Christine Martin
March 9, 2023

I-733.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: christine martin <cmcelsemartin@gmail.com>
Sent: Thursday, March 9, 2023 7:54 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Christine M.Clese Martin
5933 Shaker Drive
Riverside, CA 92506
cmcelsemartin@gmail.com

Letter I-734

Christine Martin
March 9, 2023

I-734.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: christine martin <cmcelsemartin@gmail.com>
Sent: Thursday, March 9, 2023 8:12 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat. California has lost more than 1 million acres of natural area in the last 20 years. This devastation has wrecked many ecosystems. I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Christine M.Clese Martin
5933 Shaker Drive
Riverside, CA 92506
cmcelsemartin@gmail.com

Letter I-735

Christine Martin
March 9, 2023

I-735.1 This comment letter is Form Letter C – Biological Resources with the following added: "California has lost more than 1 million acres of natural area in the last 20 years. This devastation has wrecked many ecosystems." The modifications to the form letter do not raise any new or different issues or concerns about the adequacy of the environmental analysis included within the Draft EIR. As such, in response to this comment, please see Form Letter C Response.

INTENTIONALLY LEFT BLANK

From: christine martin <cmcelsemartin@gmail.com>
Sent: Thursday, March 9, 2023 8:49 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-736.1

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents. Riverside is a community based on healthy, thriving neighborhoods. Aesthetics are an important element in the continued growth of our city as an appealing place to live, work, and raise a family. The Orangecrest neighborhood is recognized as one of the best areas in Riverside to settle. I am asking for you to explain how 4.7 million square feet of warehouses will improve the aesthetics of the neighborhood, maintaining I-736.2

Orangecrest as a desirable place to make a home. I-736.2 Cont.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you. I-736.3

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Christine M.Clese Martin
5933 Shaker Drive
Riverside, CA 92506
cmcelsemartin@gmail.com

Letter I-736

Christine Martin
March 9, 2023

I-736.1 This comment is the same as the first half of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-736.2 This comment states that the Orangecrest neighborhood is a desirable place to live and asks how developing 4.7 million square feet of warehouses will improve the aesthetics of the neighborhood. This comment incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. In response to this comment, please see Section 4.1, Aesthetics, in the Draft EIR as well as Topical Response 1 – Aesthetics.

I-736.3 This comment is the same as the second half of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: C M <cmaf777@hotmail.com>
Sent: Thursday, March 9, 2023 5:36 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

I-737.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities. These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to

I-737.1 Cont.

consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

I-737.1 Cont.

Thank you for allowing me to provide comments on this project.

Sincerely,

Clay Muehls
5908 Hawarden Dr.
Riverside CA 92506
cmaf777@hotmail.com

Letter I-737

Clay Muehls
March 9, 2023

I-737.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: C M <cmaf777@hotmail.com>
Sent: Thursday, March 9, 2023 5:38 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Clay Muehls
5908 Hawarden Dr
Riverside CA 92506
cmaf777@hotmail.com

Letter I-738

Clay Muehls
March 9, 2023

I-738.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: C M <cmaf777@hotmail.com>
Sent: Thursday, March 9, 2023 5:38 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Clay Muehls
5908 Hawarden Dr.
Riverside, CA 92506

Letter I-739

Clay Muehls
March 9, 2023

I-739.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: C M <cmaf777@hotmail.com>
Sent: Thursday, March 9, 2023 5:39 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Clay Muehls
5908 Hawarden Dr
Riverside CA 92506
cmaf777@hotmail.com

Letter I-740

Clay Muehls
March 9, 2023

I-740.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: C M <cmaf777@hotmail.com>
Sent: Thursday, March 9, 2023 5:39 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Clay Muehls
5908 Hawarden Dr.
Riverside, CA 92506
cmaf777@hotmail.com

Letter I-741

Clay Muehls
March 9, 2023

I-741.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: C M <cmaf777@hotmail.com>
Sent: Thursday, March 9, 2023 5:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Clay Muehls
5908 Hawarden Dr.
Riverside, CA 92506
cmaf777@hotmail.com

Letter I-742

Clay Muehls
March 9, 2023

I-742.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: C M <cmaf777@hotmail.com>
Sent: Thursday, March 9, 2023 5:41 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Clay Muehls
5908 Hawarden Dr.
Riverside, CA 92506
cmaf777@hotmail.com

Letter I-743

Clay Muehls
March 9, 2023

I-743.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Perez, Corinne <perezc@ajiusa.com>
Sent: Thursday, March 9, 2023 7:16 AM
To: Dan Fairbanks
Cc: district5@rivco.org; ccondor@riversideca.gov; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-744.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-744.1 Cont.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Corinne Perez
perezc@ajiusa.com

Letter I-744

Corinne Perez
March 9, 2023

I-744.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Perez, Corinne <perezc@ajiusa.com>
Sent: Thursday, March 9, 2023 12:45 PM
To: Dan Fairbanks

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-745.1

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. It is apparent around the United States, how communities are being impacted by industrial hazards and accidents. Increasing events such as train derailments, fire, toxic chemicals, electric batteries and so on.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various areas surrounding our neighborhood, including airplanes that are overhead almost daily performing training maneuvers or when jets fly causing the noise decibel to be remarkable. I-745.2 I-745.3

This project is the most egregious as it is right up into our neighborhood from the freeway, not in the surrounding industrial areas. We literally will have warehouse buildings inside our backyards. How can you conscientiously do this and explain down the hazards? We moved into this lovely neighborhood in 1994 because of the schools and the city/rural life; expecting this to be our forever home. We have now reached retirement age, and are faced with this tragedy. I-745.4

There are plenty of open spaces traveling east. It is difficult to understand how the powers that be, believe this is a viable option for our community and force this on us. Existing traffic is horrendous and causes gridlock as we are a captive audience surrounded by only 2 exits, Van Buren or Trautwein. Opening Barton Road is not a positive move since the project proposes 2500 more diesel trucks and vehicles. The drive to electric vehicles does not remedy the situation. Zero-emission technologies...don't really exist for big heavy-duty trucks that are pulling cargo. This is our green space where we live and walk around the neighborhood with our grandchildren and dogs. I-745.5 I-745.6

We don't want industrial jobs neighboring homes and the hazards and risks that come with it. At this time, there are many vacant industrial buildings with more to come as many employees continue to work from home, including me. Companies are being challenged with finding people to work. Orangecrest is and has been exposed to airplane pollution, noise from maneuvers and jets overhead, on an almost daily basis. Even slight increases in people's exposure can lead to a heightened risk of premature illnesses and death. Exposure to diesel exhaust can lead to serious health conditions like asthma and respiratory illnesses and can worsen existing heart and lung disease, especially in children and the elderly. These conditions can result in increased numbers of emergency room visits, hospital admissions, absences from work and school, and premature deaths. I-745.7

Sincerely,
Corinne Perez

8353 Rosemary Dr.
Riverside, CA 92508
perezc@ajiusa.com

Letter I-745

Corinne Perez
March 9, 2023

I-745.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8 - Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

The comment further raises general concerns regarding the Draft EIR's air quality analysis. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27.

The comment concludes with a general statement regarding industrial hazards and accidents. No further response is required.

I-745.2 This comment states that the Draft EIR did not take cumulative impacts of adjacent industrial development into consideration. Throughout Chapter 4, Environmental Impact Analysis, within Sections 4.1 through 4.18, of the Draft EIR, existing development, including adjacent industrial development, is incorporated in the existing baseline conditions. Cumulative impacts of the Project and approved/proposed development listed in Table 4.2 in addition to existing baseline conditions were evaluated for each environmental topic within the Draft EIR. Additionally, in response to this comment, please see Topical Response 7 – Cumulative Impacts where additional discussion about cumulative impacts is provided.

I-745.3 This comment discusses aircraft flying overhead. Existing flight operations are existing conditions that were taken into account in the noise analysis included in Section 4.11, Noise. The Project would not result in any new or different aircraft operations. As such, no further response is provided.

I-745.4 This comment raises concerns about hazards associated with warehouse uses adjacent to residential uses. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of the EIR. The proposed Conservation Easement will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum

of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. Industrial buildings must be set back a minimum of 1,000 feet from residential. In addition, any industrial-use building will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 3.5.4, Off-Street Loading Facilities, and Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan require truck courts and loading docks to be oriented away or screened to reduce visibility public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties, and prohibits loading and unloading activities within view of public streets or residential land uses.

Potential hazards associated with hazards and hazardous materials being used and/or stored at the Project site are evaluated within Recirculated Section 4.8, Hazards and Hazardous Materials. Recirculated Section 4.2, Air Quality and Appendix C-2 assessed the Project's health risks. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Specific Plan construction-source DPM emissions is estimated at 0.59 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. For operations, at the MEIR, is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, and Appendix C-2 for the discussion of cumulative health risks from toxic air contaminants.

I-745.5 This comment requests consideration of alternative sites for the Project and raises concerns about traffic increases on Van Buren and Trautwein. Chapter 6, Alternatives, of the Draft EIR determined there were no viable alternate sites for the Project. The Project Traffic Analysis (Appendix N-2) provides

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

The comment raises concerns regarding trucks on Barton. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway.

I-745.6 This comment questions the conversion of heavy duty trucks and vehicles to zero-emission technologies. MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the Project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the Project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed.

I-745.7 This comment summaries Comments I-745.1 to I-745.6; please see Responses I-745.1 to I-745.6, above. The comment mentions 'many vacant industrial buildings.' According to Table 1 of the draft "Economic Impact Analysis of the March Joint Powers Authority (MJPA) Development Projects" by Dr. Qisheng Pan presents 2023 employment data for the various existing developments within the March JPA Planning Area (Final EIR Appendix U), there are few vacancies within the March JPA Planning Area.

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From: Chad Smith <chadsmithx@gmail.com>
Sent: Thursday, March 9, 2023 6:47 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-746.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach
· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.
Sincerely,

I-746.1
Cont.

Chad Smith
8433 Gessay Place
Riverside, CA 92508
chadsmithx@gmail.com
Cell 909-225-4077
Fax 951-653-1003

Letter I-746

Chad Smith
March 9, 2023

I-746.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Duffy Atkinson <datkinson1@att.net>
Sent: Thursday, March 9, 2023 8:12 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.
This is public comment for the record on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). I-747.1

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. Remember that 40+ MILLION square feet of 'World Logistic Center' warehouse space is breaking ground this year just east of us in Moreno Valley. That project is 10% of the ENTIRE CITY! I-747.2

The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-747.3

Please go back and look at the feasibility of developing a TRUE industrial/manufacturing hub that, by its nature, will pull real, sustainable, high-paying/high-education jobs to the facilities which would mean far better community integration potential and doing a MUCH better job of satisfying the agreed upon "good neighbor" concept. I-747.4

Thank you.

Duffy Atkinson
Riverside, CA

Letter I-747

Duffy Atkinson
March 9, 2023

I-747.1 This comment is introductory in nature and does not raise any specific issues or concerns regarding the adequacy of the analysis in the Draft EIR. As such, no further response is provided.

I-747.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. This comment references the World Logistics Center project in the City of Moreno Valley. This comment does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-747.3 This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8 - Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

I-747.4 This comment requests consideration of an industrial/manufacturing hub alternative. Under the proposed Project, industrial and manufacturing uses such as those suggested by the comment are allowed, as specified in Table 3-2, Land Uses by Land Use Designation, in Recirculated Chapter 3, Project Description. The Project does not have identified end-users and nothing under the proposed Project would preclude the development of campus facilities and research centers if there were an interest and need for these facilities within the Project area. The comment also references the "good neighbor" concept. In response to this comment, please see Recirculated Section 4.10, Land Use and Planning, and Topical Response 4 – Project Consistency, for an analysis of the Project's consistency with the Good Neighbor Guidelines of the County of Riverside and the City of Riverside. As discussed in Recirculated Section 4.10, Land Use and Planning, the purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, March 9, 2023 9:24 AM
To: Dan Fairbanks
Subject: Jobs/green house commitment

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,1_ydfWXa-L5ffYWpLYKJ10X-DFnB9or-O3eEYbKpJry4O-BASArslH6xByQG2luZkHOj4n1av3xzjDhCSJeLKFXPTJnZ_bCqTUj5Xk-4&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,yj9gDa-MYVd-BC25--

oOX14UQDtMN8C_uZwRG1OuBrGJ7z3l5M5qbC4a_TdzcZtkN1WQoKvz8iCVmDscC9O0m3gUpjXEYnMxsUiIO17TOaI,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

David Doty
8805 Morninglight Cir
https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fAnimal.adventure.army&c=E,1,bUhkdnCDEAmrxD-MFcEomUNlpgP0WaZb-kufCtaeAkX8S2uYUDublGY69xUZ5nXmQsA17uM7DNk8DJ66b59u7B6b1PPc8kHXP2V4O5IiaeTHZIGpEnHmQugZQQ,,&typo=1@ gmail.com

Sent from my iPhone

Letter I-748

David Doty
March 9, 2023

I-748.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, March 9, 2023 9:26 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I'd like to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual, real time conditions of the surrounding area. Thank you!

Sincerely,
David Doty
8805 Morninglight Circle, 92508
Animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-749

David Doty
March 9, 2023

I-749.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, March 9, 2023 9:28 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

David Doty 8805 Morninglight Cir Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-750

David Doty
March 9, 2023

I-750.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, March 9, 2023 9:31 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

David Doty 8805 Morninglight Cir Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-751

David Doty
March 9, 2023

I-751.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, March 9, 2023 9:34 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I would like to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

David Doty 8805 Morninglight Cir Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-752

David Doty
March 9, 2023

I-752.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, March 9, 2023 9:36 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

David Doty 8805 Morninglight Cir Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-753

David Doty
March 9, 2023

I-753.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Thursday, March 9, 2023 9:39 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

David Doty 8805 Morninglight Cir Riverside 92508 animal.adventure.army@gmail.com

Sent from my iPhone

Letter I-754

David Doty
March 9, 2023

I-754.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Denette Lemons <lemonsdenette@gmail.com>
Sent: Thursday, March 9, 2023 10:44 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

I-755.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-755.1 Cont.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Denette Lemons 8634 de loss dr riverside 92508

Thank You

Denette Lemons
lemonsdenette@gmail.com

Letter I-755

Denette Lemons
March 9, 2023

I-755.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Dolores Reyna <dtreyna@verizon.net>
Sent: Thursday, March 9, 2023 6:56 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

I-756.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-756.1 Cont.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Dolores Reyna
8472 Applegate Ct
Riverside, CA 92508
Dtreyna@verizon.net

Letter I-756

Dolores Reyna
March 9, 2023

I-756.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: David Reznick <gupy@ucr.edu>
Sent: Thursday, March 9, 2023 10:11 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, EIR, State Clearinghouse No. 2021110304

March 8, 2023
Dear Mr. Fairbanks,

I would like to comment on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The draft EIR does not properly analyze the Project's impacts, in particular, with regard to biological resources. It also discounts non-industrial alternatives to the Project as requested by the community. I-757.1

I am a professor in the Department of Evolution, Ecology and Organismal Biology at UC Riverside and have lived in Riverside for over 30 years. I have done research on local wildlife and am intimately familiar with the local fauna. I have several concerns regarding the biological resources section of the EIR, as outlined below, including both the methodology of the studies and the conclusions drawn from them. I-757.2

Plants and Wildlife:

1. I challenge the assessment that up to 80% of the grasses in the Project Study Area are non-native. Native grasses are often interspersed within clumps of non-native shrubs. I suspect that the assessment that 80% of the grasses are non-native is an over-estimate. I-757.3
2. The overestimate error of native grasses is important because it leads to a second problem in the report, which is that certain wildlife species, for example the Los Angeles pocket mouse, are listed as being low potential to occur there. This judgement may be incorrect because their habitat has been underestimated. This would also be the case for coast horned lizards, which could be in the Project Study Area. The horned lizards normally occupy such habitat in this area. One way to assess the likelihood of their presence is to assess the abundance of harvester ant mounds. A usual cause of the disappearance of horned lizards in the vicinity of suburbs is that the enhanced availability of water attracts the invasive Argentine ants, which in turn eliminate the harvester ants that are the preferred food of the horned lizards. If harvester ants continue to thrive on portions of the property, then the horned lizards are likely to be present. They are not likely to be seen in a cursory survey. I-757.4 I-757.5
3. Some wildlife such as the orange-throated whiptail were not observed but listed as moderate potential to occur within the Project Study Area. This species is certain to be in the Study Area based on my personal observations. I-757.6
4. The red-diamond rattlesnake (which should be listed as red-diamondback rattlesnake) is listed under the Potential to Occur section as "low" and "suitable chaparral, coastal sage scrub, or creek bank habitats are limited or not present." However, the habitat listed is incorrect since these snakes prefer rocky areas. I have seen this snake species in the Study Area in the past. I-757.7
5. I did not see an insect survey which should be done since insects are especially important parts of the ecosystem in the Project Study Area. I-757.8

Vernal Pools:

It appears that the studies used in the EIR were conducted in 2021 and 2022, which were drought years. The fact that Protocol surveys were conducted for Riverside Fairy Shrimp and Vernal Pool Fairy Shrimp and were negative is meaningless under these dry conditions. Studies should be conducted during years with adequate rainfall to support vernal pools throughout the wet season. The few rains early in the season in 2021 and 2022 were not enough to perform a correct assessment since some species will not emerge until later rains are present. This year would be ideal I-757.9

for such surveys. The fact that spadefoot toads are present on the property means that it is likely that there are appropriate vernal pools to sustain the fairy shrimp.

Based on my experience, fairy shrimp should be present in this Study Area given that it is known from appropriate vernal pools on March Air Force base, which is close by and is similar habitat. If fairy shrimp are not observed in vernal pools, sampling needs to include collecting dirt from the bottom of the vernal pools and incubation under correct conditions to see if fairy shrimp emerge from dormant cysts in the soil.

I-757.9 Cont.

Blue Line Stream:

The direct or indirect effects of the Project on the Blue Line stream running through Sycamore Canyon is not analyzed. This steam is a tributary of the Santa Ana River and is an ecologically sensitive aquatic environment.

I-757.10

Wildlife Corridors:

The presence of the Project Study Area in a multi-species wildlife corridor is of grave concern. This corridor is part of the Multispecies Habitat Conservation Plan. A critical feature of that plan is that appropriate corridors that join larger tracts of land, such as Sycamore Canyon and the Box Springs Mountains, be maintained to allow for animals to move between them. Such movement and mixing of populations is essential for them to sustain larger effective population sizes and genetic diversity. The mitigation measures proposed are inadequate to deal with the harm that the Project will impose on this sensitive wildlife area.

I-757.11

Given these deficiencies, I request that you do the additional analyses and studies listed above. These include appropriate surveys for harvester ant mounds as a measure of the suitability of the habitat for horned lizards, an appropriate survey of the vernal pools during a rainy season, a more complete assessment of the role this land plays as a wildlife corridor and how losing it would affect the connections among the larger tracts of land that flank it, and an assessment of whether or not construction activities and subsequent land use will affect the drainage area feeding the blue line stream in Sycamore Canyon.

I-757.12

Thank you for allowing me to provide comments on this project.

Sincerely,

David Reznick, Ph.D.
Distinguished Professor, UC Riverside Dept. of Evolution, Ecology and Organismal Biology
5085 Queen St. Riverside, CA 92506
David.reznick@ucr.edu

Letter I-757

David Reznick, Ph.D.
March 9, 2023

I-757.1 This comment summarizes the letter's overall concerns. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR. As such, no further response is provided.

I-757.2 This comment summarizes the commenter's subject matter expertise and overall concerns. The comment raises no specific issues, questions or concerns about the analysis in the Draft EIR. As such, no further response is provided.

I-757.3 The comment raises concerns regarding the amount of non-native grasses that is reported to be on the Project site in Section 4.3, Biological Resources, of the Draft EIR and the Project Biological Resources Technical Report (Appendix D-1). As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), the Project Biological Technical Report does not present an assessment of the relative quantity of native versus non-native grasses on the Project site. The report does note that the vast majority of the Project site (approximately 342 acres) is classified as non-native grassland herbaceous semi-natural stand as defined by the Manual of California Vegetation, 2nd Edition (Sawyer et al. 2009). While sporadic native plants may be present within this vegetation community, it is heavily dominated by non-native grasses. Following the Manual of California Vegetation, dominate species and relative cover of those species are used to classify the land into distinct alliances. The on-site non-native grassland is classified as *Bromus rubens – Schismus* (*arabicus, barbatus*) Herbaceous Semi-Natural Alliance which requires greater than 80% relative cover in the herbaceous layer of *Bromus rubens* and/or *Schismus barbatus*. During the general biological field surveys, RBC biologists estimated that non-native grasses accounted for greater than 80% relative cover of the herbaceous vegetation. Please note that vegetation classifications are based on relative cover which is an estimation of the percentage of the area covered by the vegetation rather than a count of the number of individuals within each species. A widely acknowledged disadvantage of this method is that cover can vary greatly depending on climatic conditions including seasonality. In addition, cover is based on estimations that can vary between researchers when looking at the same area. Despite these shortcomings, the industry accepts this method of classification as best practice.

I-757.4 This comment raises concerns regarding potential Project impacts to wildlife species that rely on native grasses for habitat. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2) and noted in Response I-757.3, above, RBC biologists estimated that non-native grasses accounted for greater than 80% relative cover of the herbaceous vegetation. This qualifies the land as *Bromus rubens – Schismus* (*arabicus, barbatus*) Herbaceous Semi-Natural Alliance under the Manual of California Vegetation.

The relative cover of non-native grasses on the site is not the sole environmental factor assessed for determining Los Angeles pocket mouse potential to occur. Many other conditions help determine the likely of species occurrence, including, but not limited to, soils suitable for burrowing and general disturbance level on site. (Appendix D-2)

Based on habitat assessments, local knowledge, and previous records of this species, the Los Angeles pocket mouse has low potential to occur. Recent trapping studies from locations approximately 1.5

and 2 miles from the proposed Project site did not detect this species. Specifically, trapping was conducted in 2018 by Dr. Phil Brylski (USFWS TE148555 and CDFW MOU) for the Meridian Trunk Sewer Project south of the Project site, which yielded captures of six small mammal species: Stephens kangaroo rat (SKR), San Diego pocket mouse (*Chaetodipus fallax fallax*), deer mouse (Peromyscus maniculatus), harvest mouse (*Reithrodontomys megalotis*), house mouse (Mus musculus) and black rat (*Rattus rattus*) . Trapping was also conducted the same year at the K4 Warehouse Project east of the Project site, which yielded captures of one small mammal species: the deer mouse (*Peromyscus maniculatus*). (Appendix D-2)

Three records of Los Angeles pocket mouse within the vicinity of the Project site are documented in CNDDB. These records are approximately one to three miles from the Project site and were documented in 1990, 1992, and 1993. There are no recent records of this species from the immediate area. (Appendix D-2)

I-757.5 This comment raises concerns regarding potential Project impacts on horned lizards. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), while the dense non-native grasslands have low suitability for supporting this species, there are portions of the study area with various dirt roads, parking areas, and trails that have potential to support coast horned lizards and harvester ants. The habitat description, potential to occur, and impacts analysis have been revised in the Project Biological Technical Report (Appendix D-1) to include information about these open areas that may have potential to support coast horned lizard. During Project construction, direct mortality of coast horned lizard could potentially occur. A discussion of potential impacts on coast horned lizard have been added to the Project Biological Technical Report (Appendix D-1). With the implementation of MM-BIO-1 (Best Management Practices), potential impacts to the coast horned lizard would be less than significant. In addition, habitat-based mitigation would occur as described in MM-BIO-8 (Upland Vegetation Communities).

I-757.6 The commenter asserts that the orange-throated whiptail is in the Study Area. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), within Section 4.3, Biological Resources, of the Draft EIR and the Project Biological Technical Report (Appendix D-1), the potential for orange-throated whiptail was determined to be moderate; therefore, the analysis considered potential impacts on this species and impacts on this species will be less than significant with the implementation of MM-BIO-1.

I-757.7 This comment raises concerns regarding the nomenclature of the red-diamond rattlesnake in the Project's Biological Resources Technical Report, as well as potential Project impacts to this species. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), the Project Biological Technical Report (Appendix D-1) adheres to the nomenclature used by CDFW on the CNDDB Special Animals List (2022) which lists this species as "red-diamond rattlesnake". When this species was first described (Cope 1892), the common name "red-diamond rattlesnake" was assigned to this species. This common name has persistent throughout changes in nomenclature: *Crotalus ruber* - Red Diamond Rattlesnake (Stebbins & McGinnis 2012), *Crotalus ruber ruber* - Northern Red Rattlesnake (Stebbins 1985, 2003), *Crotalus ruber ruber* - Red Diamond Rattlesnake (Wright & Wright 1957, Stebbins 1966, Klauber 1982), *Crotalus ruber* - Red Diamond Rattlesnake (Stebbins 1954), *Crotalus exsul* - Red Rattlesnake (*Crotalus atrox*, part; *Crotalus adamanteus ruber; Crotalus atrox ruber;*

Crotalus ruber. Red Diamond Rattlesnake; Western Diamond Rattlesnake, part) (Grinnell and Camp 1917), *Crotalus ruber* - Red Rattlesnake (Atsatt 1913)[1].

Red diamond rattlesnake is a CDFW Species of Special Concern. Rocky outcrops are limited within the Project site and primarily occur in the adjacent lands to the south and east. Areas with suitable habitat for red-diamond rattlesnake primarily occur in the planned conservation areas. Habitat with highest suitability occurs outside the proposed Project limits and the species does not have a high likelihood for occurrence within the Project impact area; therefore, this species has a low potential to occur on the Project site. The habitat description, potential to occur table information, and impacts analysis have been revised in the Project Biological Technical Report (Appendix D-1). Similar to other species, habitat-based mitigation would occur as described in MM-BIO-8 (Upland Vegetation Communities) and potential direct mortality would be minimized to the maximum extent practicable with implementation of MM-BIO-1 (Best Management Practices). (Appendix D-2)

I-757.8 The comment raises concerns regarding the lack of an insect survey as part of the Project's environmental analysis. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), habitat assessments were performed for all special-status species, including insects, in compliance with CEQA requirements. No special status insects were observed during general biological surveys and no special status insects have a moderate or high potential for occurrence on the Project site (please see section 3.4.2 of the Project Biological Technical Report – Appendix D-1). Note that biological evaluation of the Project site and observed species lists were not intended to be exhaustive, but to provide sufficient information for decision makers to understand the environmental consequences of the proposed Project. Please note also that impacts on native vegetation communities were assessed as part of the analysis and mitigation is provided for those impacts; much like NCCP planning it is generally assumed that habitat mitigation also protects more common (non-special status) species that those habitats support. Please see sections 4 and 5 of the Project Biological Technical Report (Appendix D-1) for additional information.

I-757.9 This comment raises concerns regarding potential Project impacts on vernal pool fairy shrimp. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), Project fairy shrimp surveys were done in compliance with USFWS protocols and included both wet season and dry season surveys. Dry season surveys were performed by collecting soil at multiple locations within each potential habitat area, sieving collected soil for cysts, hatching out cysts and identifying any hatched shrimp to species level (all performed by USFWS permitted biologists).

The dry season surveys that were performed on-site help ensure species detection regardless of wet season rainfall or ponding duration. Of the ten Project site basins sampled during dry season, eight basins supported fairy shrimp cysts. The hatched fairy shrimp were all identified as the common versatile fairy shrimp (*Branchinecta lindalhi*). Dry season soil sampling and subsequent hatching and rearing of fairy shrimp followed protocols determined by the agencies to provide reliable data. The presence of spadefoot toad does not necessarily indicate the presence of listed fairy shrimp species. (Appendix D-2)

[1] California Herps. (2023). Red Diamond Rattlesnake. Retrieved March 18 from https://californiaherps.com/snakes/pages/c.ruber.html.

I-757.10 The comment raises concerns regarding the analysis of Project impacts on aquatic resources, such as a Blue Line stream. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), the proposed Project site and Sycamore Canyon are now separated by residential development and Alessandro Blvd. It appears that water from the Project site flows down Avenida Munoz, Camino Del Sol, and several concrete drainages prior to flowing under Alessandro Blvd through culverts to Sycamore Canyon. The Project Aquatic Resources Delineation Report (ARDR; Appendix D-1) identifies two areas that may have been historically connected to the Blue Line stream running through Sycamore Canyon; these are identified as non-wetland water (NWW)-1 and NWW-2 in ARDR figures.

Direct and indirect impacts on non-wetland waters of the U.S. identified on the Project site are accounted for within the Project impact analysis (please see sections 4.2 and 5.8 of the Project Biological Technical Report – Appendix D-1) and the Project will be permitted through the Army Corps of Engineers, CDFW and the Regional Water Quality Control Board. All requirements by the agencies during permitting, including best management practices as it pertains to water quality, will be adhered to. (please see MM-BIO-9 [Aquatic Resources Mitigation] and sections 4.2 and 5.8 of the Project Biological Technical Report [Appendix D-1])

I-757.11 The comment raises concerns regarding potential Project impacts to MSHCP wildlife corridors. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), neither the proposed Project site nor any areas in the vicinity of the Project site are within any of the 38 designated MSHCP habitat linkages identified on Figure 3-2 of the MSHCP plan. The conservation areas near the site are identified as existing quasi-public core reserves in MSHCP mapping; however, neither the site nor any surrounding areas are identified as an existing or proposed MSHCP linkage (Dudek 2003)[2].

As stated in Section 4.5 of the Project Biological Technical Report (Appendix D-1), the Project area likely serves as a local wildlife corridor between undeveloped areas to the south of the site and the open space areas immediately north of the Project site, north of Alessandro Avenue, which includes Sycamore Canyon approximately 4,000 feet to the northwest of the site. The Project area also likely serves as a steppingstone corridor for avian species moving through this area, including least Bell's vireo which occur in Meridian Conservation Areas 1 and 2 to the south of the site north and south of Van Buren Boulevard. (Appendix D-2)

With full build-out of the development area (e.g., Specific Plan Area), an undeveloped corridor would be retained immediately east of the site as part of the 664 acres of land placed into conservation easement. This undeveloped land would maintain a corridor between site development and nearby residential development, including significant areas of riparian habitat. (Appendix D-2)

The planned extension of Cactus Avenue bisects the undeveloped corridor; however, two wildlife crossings under the road are planned to mitigate for impacts to wildlife that rely on land locomotion. In addition, one wildlife crossing is planned under the Brown Street extension to further facilitate wildlife movement. The crossings will consist of soft-bottomed culverts approximately 6 feet in height by 20 feet in width to allow for adequate passage of animals north to south under Cactus Avenue and east to west under Brown Street. The two Cactus Avenue wildlife crossings will be approximately 240 feet in length and the Brown Street wildlife crossing will be approximately 150 feet in length. These

2 Dudek. 2003. Western Riverside County Multiple Species Habitat Conservation Plan. Information obtained from https://rctlma.org/Portals/0/mshcp/volume1/index.html

specifications follow the CBD Settlement Agreement, which prescribed design standards suitable to accommodate local land locomotive species.

Additionally, 60 acres of open space/park is planned for the western portion of the Project that buffers the existing residential uses west of the site, which will be included within the Project's General Plan Amendment. This western open space area will still allow for the movement of wildlife to the west of the Project as well. As such, impacts on wildlife corridors would be less than significant.

I-757.12 The comment requests that additional analyses be conducted to address the commenter's previous concerns. Please see Responses I-757.5 and I-757.8 regarding horned lizards and insects; Response I-757.9 regarding fairy shrimp; Response I-757.11 regarding wildlife corridors; and response to comment I-757.10 regarding drainage/aquatic resources.

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From: Eileen Bloom <inaobmonet15@gmail.com>
Sent: Thursday, March 9, 2023 4:54 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

I-758.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-758.1
Cont.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Eileen Bloom

8645 Morninglight Circle
Riverside 92508
Inaobmonet15@gmail.com

Letter I-758

Eileen Bloom
March 9, 2023

I-758.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: E E_____Ha__ <eestrella25@msn.com>
Sent: Thursday, March 9, 2023 5:59 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

I-759.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

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I-759.1 Cont.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Elisa Estrella-Hahn
20021 Camino Del Sol
Riverside, Ca 92508
eestrella25@msn.com

Letter I-759

Elisa Estrella-Hahn
March 9, 2023

I-759.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Esmeralda Montes <emts.deo@gmail.com>
Sent: Thursday, March 9, 2023 11:09 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. I-760.1

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics.

The plan's inclusion of parks, recreation, and open space are only creating an attractive barrier around the one thing that will have the greatest negative effect on the surrounding community — the warehouses! For those of us who have lived here for the majority of our lives, especially the children, we are accustomed to the fact that our parks/reaction spaces aren't surrounded by industrial buildings. That being said, **who would choose a new park, that's *right* next to warehouses, over the currents ones that are well integrated into the community**? Has anyone working on this project contacted the community to see if they agree that this construction will benefit them? Also, the EIR's Aesthetics section states that "total construction activities are expected to be underway for approximately 4.5 years". If it is anticipated that neighbors will deal ***solely*** with the construction for so long, that is more reason to include the communities input! I-760.2

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. **Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units.** Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. I-760.3

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. **I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit.** This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

I-760.3 Cont.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Esmeralda M 92553

X emts.deo@gmail.com

Letter I-760

Esmeralda Montes
March 9, 2023

I-760.1 This comment is the first half of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-760.2 This comment questions the placement and desirability of a park immediately adjacent to warehouses. Please see Topical Response 4 - Project Consistency, for a discussion of settlement agreements directing the location of the proposed Park. The comment raises general aesthetics concerns regarding the 4.5-year estimated construction period. MM-AES-1 (Construction Equipment Staging and Screening) requires all large construction equipment and vehicles to be outside the public viewshed when not in use. With incorporation of MM-AES-1, the Project's aesthetics impacts during construction would be less than significant. The comment expresses general opposition to the Project and does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-760.3 This comment is the second half of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Esmeralda Montes <emts.deo@gmail.com>
Sent: Thursday, March 9, 2023 11:34 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. **Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.**

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

I-761.1

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

Also, with the finished construction of Meridian, Cactus Avenue ended in a cul-de-sac. Coincidentally, this street will connect to the West Campus Upper Plateau Project. Was this cul-de-sac part of Cactus intended to lead further down to the bunkers? How long has the project been in the works without the knowledge of the neighbors?

I-761.2

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-761.3

Thank you for letting me comment on your project.

Sincerely,

Esmeralda M 92553

X emts.deo@gmail.com

Letter I-761

Esmeralda Montes
March 9, 2023

I-761.1 This comment is the first half of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-761.2 This comment questions when the cul-de-sac part of Cactus Avenue was intended to lead further to the Project site. As adopted in 1996, Exhibit 2-1, Transportation Plan (Planned Roadway/Street System), shows Cactus Avenue extending into the Project site.

I-761.3 This comment is the second half of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Esmeralda Montes <emts.deo@gmail.com>
Sent: Thursday, March 9, 2023 11:45 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

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I-762.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
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2. Alternate plan #2: The Veterans Village Approach
· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-762.1 Cont.

3. Alternate plan #3: **The State or County Park Approach**
· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Esmeralda M 92553

X emts.deo@gmail.com

Letter I-762

Esmeralda Montes
March 9, 2023

I-762.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Felicia Valencia <feliciavalencia@msn.com>
Sent: Thursday, March 9, 2023 6:55 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

I-763.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-763.1 Cont.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Felix and Felicia Valencia
Felixv25@msn.com, Feliciavalencia@msn.com
19706 Krameria Ave
Riverside, CA 92508

Letter I-763

Felix and Felicia Valencia
March 9, 2023

I-763.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

INTENTIONALLY LEFT BLANK

From: fera momtaz <fera_momtaz@yahoo.com>
Sent: Thursday, March 9, 2023 4:17 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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I-764.1

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
<include name, address, email in signature line>

I-764.1
Cont.

Letter I-764

Fera Momtaz
March 9, 2023

I-764.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:23 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Freddie Quintana
8541 Rosemary Dr
Riverside, CA 92508
Fdquintana@yahoo.com

Sent from my iPhone

Letter I-765

Freddie Quintana
March 9, 2023

I-765.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:25 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Freddie Quintana
8541 Rosemary Dr
Riverside, CA 92508
Fdquintana@yahoo.com

Sent from my iPhone

Letter I-766

Freddie Quintana
March 9, 2023

I-766.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:28 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,ZPS5tkIVCnSTCUaRNXKswmekoKJsQ1i0aOKV5GvwsMPOcCi8e4TavsHLa8v2oWDONgkK0fNg92BXIb4XARGfAzeknuT9GnMrIKg1Dy7UFy1okK8fCc_2AA,,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone

(https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-deir0213.pdf%2c&c=E,1,TZoQa5GLBLVgBlhoc4G47aStCm1kxecgUquEP_4nZktvCnfSuadfYdwZA6Dm6H-4t6RrXZBcotXbPczpk1lKNa61uAUdyBIVePFzJS4FY3pLPRYnQQ,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Freddie Quintana
8541 rRosemary Dr
Riverside, CA 92508
Fdquintana@yahoo.com

Sent from my iPhone

Letter I-767

Freddie Quintana
March 9, 2023

I-767.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:30 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Freddie Quintana
8541 Rosemary Dr
Riverside, CA 92508
Fdquintana@yahoo.com

Sent from my iPhone

Letter I-768

Freddie Quintana
March 9, 2023

I-768.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:33 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Freddie Quintana
8541 Rosemary Dr
Riverside, CA 92508
Fdquintana@yahoo.com

Sent from my iPhone

Letter I-769

Freddie Quintana
March 9, 2023

I-769.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:35 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Freddie Quintana
8541 Rosemary Dr
Riverside, CA 92508
Fdquintana@yahoo.com

Sent from my iPhone

Letter I-770

Freddie Quintana
March 9, 2023

I-770.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:38 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Freddie Quintana

Letter I-771

Freddie Quintana
March 9, 2023

I-771.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:46 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

I-772.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

I-772.1 Cont.

Personally, I feel we need areas to shop and dine so that our tax dollars remain in Riverside. Currently, Corona and Rancho Cucamonga are areas that our residents go to be entertained. The areas that the unsightly warehouses are located would better serve our community as a beautiful green space to enjoy family time.

I-772.2

Thank you for allowing me to provide comments on this project.

Sincerely,

Freddie Quintana
8541 Rosemary Dr
Riverside, CA 95208
Fdquintana@yahoo.com

Sent from my iPhone

Letter I-772

Freddie Quintana
March 9, 2023

I-772.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

I-772.2 This comment suggests that the area needs more shopping and dining opportunities locally as well as more green space. The proposed Specific Plan allows retail and dining uses in the Mixed Use parcels. Additionally, the Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

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From: Fernando sosa jr. <sosa1977@gmail.com>
Sent: Thursday, March 9, 2023 7:06 AM
To: Dan Fairbanks
Cc: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

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I-773.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-773.1
Cont.

3. Alternate plan #3: The State or County Park Approach
· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Fernando Sosa Jr . Orangecrest resident

Letter I-773

Fernando Sosa Jr.
March 9, 2023

I-773.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Gayle Dicarlantonio <gayledmail@gmail.com>
Sent: Thursday, March 9, 2023 5:56 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Gayle DiCarlantonio
Riverside 92507
gayledmail@gmail.com

Letter I-774

Gayle DiCarlantonio
March 9, 2023

I-774.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

INTENTIONALLY LEFT BLANK

From: honeymbernas@gmail.com
Sent: Thursday, March 9, 2023 10:10 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; jperry@riversideca.gov; mayor@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public Comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Importance: High

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project site consists of over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool, and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-775.1 I-775.2

Sincerely,

Honey Bernas

Letter I-775

Honey Bernas
March 9, 2023

I-775.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required.

I-775.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8 – Alternatives for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Rajean and Ira Long <longfam6@att.net>
Sent: Thursday, March 9, 2023 10:13 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-776.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant. Let's make our community better, not continue to degrade it. Riverside families deserve it!

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while

offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-776.1 Cont.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Ira and Rajean Long
longfam6@att.net
Riverside 92506

Letter I-776

Ira and Rajean Long
March 9, 2023

I-776.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: John Viafora <jrviafora@gmail.com>
Sent: Thursday, March 9, 2023 8:37 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes an alternate land use plan for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-777.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop a reasonable alternative to your plan for the Upper Plateau. I am in favor of this alternate project and I believe it holds considerable appeal to the community and a realistic development opportunity for the JPA and the applicant.

Alternate plan: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
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The alternate plan is consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further the alternate proposal to develop the West Campus Upper Plateau area.

I-777.1 Cont.

Thank you for allowing me to provide comments on this project.

Sincerely,
John & Mary Viafora
Indigo point, 92508, Orange Crest

Sent from my iPhone

Letter I-777

John and Mary Viafora
March 9, 2023

I-777.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Jean Aklufi <jeanaklufi@gmail.com>
Sent: Thursday, March 9, 2023 9:17 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
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· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

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2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

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I-778.1 Cont.

3. Alternate plan #3: The State or County Park Approach

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

<include name, address, email in signature line> 2

Letter I-778

Jean Aklufi
March 9, 2023

I-778.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Justin Dillon <justin.m.dillon@gmail.com>
Sent: Thursday, March 9, 2023 10:55 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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I-779.1 Cont.

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· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Justin Dillon
2602 Salerno PL
justin.m.dillon@gmail.com

Letter I-779

Justin Dillon
March 9, 2023

I-779.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Juan Garcia <garciajuan08@gmail.com>
Sent: Thursday, March 9, 2023 6:31 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-780.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

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· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-780.1 Cont.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Juan Garcia
8540 Syracuse St

Letter I-780

Juan Garcia
March 9, 2023

I-780.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: J Gonsman <teamgonsman@yahoo.com>
Sent: Thursday, March 9, 2023 9:14 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email. Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant. 1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement. Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. · Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan). · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County. 2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the

I-781.1

Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park. · Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. · Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB. · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB. 3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA). · Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire. · Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5. · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities. These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area. Thank you for allowing me to provide comments on this project.

I-781.1
Cont.

Jason Gonsman
20232 Dayton Street, Riverside 92508
Teamgonsman@yahoo.com

Letter I-781

Jason Gonsman
March 9, 2023

I-781.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Justin Grigg <justinlgrigg@gmail.com>
Sent: Thursday, March 9, 2023 6:39 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Sending this on behalf of a lifelong friend who lives, with his family, in one of the impacted neighborhoods.

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-782.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research

centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

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I-782.1 Cont.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Justin Grigg
justinlgrigg@gmail.com
Alfred NY 14802

Letter I-782

Justin Grigg
March 9, 2023

I-782.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

INTENTIONALLY LEFT BLANK

From: mkymsecltr <mkymsecltr@aol.com>
Sent: Thursday, March 9, 2023 6:34 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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Thank you for allowing me to provide comments on this project.

Sincerely,

John W. Hagmann
7043 Mission Grove Pkwy
MkyMkymsecltr@aol.com

Letter I-783

John W. Hagmann
March 9, 2023

I-783.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Janice Oien <gdojlo@yahoo.com>
Sent: Thursday, March 9, 2023 9:33 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-784.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-784.1 Cont.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

<include name, address, email in signature line> Janice oien. 20685 Camino Del Sol Gdojlo@yahoo.com Sent from my iPhone

Letter I-784

Janice Oien
March 9, 2023

I-784.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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Comment Letter I-785

From: Jerry Shearer <shearer32@verizon.net>
Sent: Thursday, March 9, 2023 4:50 PM
To: Dan Fairbanks
Subject: Public Comment: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: PublicCommentWestCampusUP-draftEIR-S4.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project. Please find the attached letter. I look forward to your thoughts and appreciate your consideration. I-785.1

Please reply to confirm receipt of this public comment.

Sincerely,

Kevin Shearer
Riverside 92508

8 March 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- General Plan of the March Joint Powers Authority, assumed March 11, 1997 date
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

I-785.2

The zoning designation in the draft EIR on page 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of these developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project making it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarize the impacts this project would have on the land and local inhabitants as included in Section 4.1 Aesthetics. This is where the comments of my letter are focused.

I-785.3

While not considered a grave impact on human life, the aesthetics of the Upper Plateau holds a significant concern for a majority of the residents of Riverside and its surrounding communities. Aesthetics is defined as a branch of philosophy concerned with the nature and appreciation of art, beauty and good taste. It has also been defined as "critical reflection on art, culture and nature". Within aesthetics, there are two main branches: one branch focuses on the appreciation of nature and natural landscapes (the Upper Plateau now), and the other branch focuses on the appreciation of human creation and in this case architecture (the Upper Plateau with warehouses on it). When considering the nature of aesthetics, people contemplate and define the ideas of beauty and value to the natural or human made objects they are examining.

When defining beauty and value, people usually arrive at a rational or even objective conclusion that an item is beautiful (like El Capitan in Yosemite) or that it has a human value (like Van Gogh's *the Starry Night*). In these instances, people can view an object and using logic and objectivity, they can agree on its beauty and value. In these cases, the object can have an aesthetic value in and of itself, the object is beautiful or valuable because it exists. On the other hand, people also add a more personal judgment to the object, one that is more subjective, one that carries with it an experience to enhance the beauty or value of an object aesthetically. These experiences can be internal to one or a few people (for example, a homeowner or a street of houses), or they can be external and observable by many people (for example, a community or congregation). With God's grace, we all deserve to enjoy the aesthetic wonders found in the Meridian West Campus, Upper Plateau. We will get to the draft EIR and Upper Plateau soon.

I-785.4

It is of importance to note first that, broadly speaking, aesthetics deals with a kind of perception, the perception of all people able to observe or consider the object, not just of the ones benefiting from possession of the object. People have to see the grace or the raw emotions of a song (from a Cooper's hawk or yellow warbler, for example), to hear the plaintiveness and comfortable quiet of nature, to notice a scenic vista's subtle curves and colors (of the sand aster or California buckwheat, for example), to feel the power of a day outdoors (on a real mountain bike trail, not one paved by developers), or to find happiness in one's surroundings without distraction and impact from the landscape or environment.

There is no instance where unbiased people find the aesthetics of large industrial development aesthetically pleasing. By proposing to destroy a natural landscape that so many people find pleasing aesthetically, you are by default saying that aesthetics are only relevant when considering building guidelines and definitions, and disregarding the public's view of aesthetics. Your sections on aesthetics in the draft EIR are written by and for the same audience, a for-profit business and is entirely dismissive of how residents and visitors to the Upper Plateau find beauty and value in this land outside of profit incentives. Your consideration of aesthetics without genuine engagement with the public is unfairly biased toward those who stand to profit financially from this project and not toward those who must live with it after the developer and the March JPA have left the area.

It is with this idea of unfair and biased consideration of aesthetics that I'd like to voice my objection to the plan proposed in the draft EIR: building mega-warehouse do not align with my idea of preserving the aesthetics of the Upper Plateau, or as I know it the March Bunkers area. Specifically, I find the following details biased, misleading, neglectful, and dismissive of the rational and experiential aesthetics of this unique, precious, and beautiful piece of land. I-785.5

- Table 1-2, 4.1 Aesthetics indicates that for three specific factors (impact on scenic vistas, degradation of existing visual character, and substantial light pollution) the impacts of the proposed development potentially are significant, but with mitigations implemented by the developer these impacts are less than significant. The people who live near this land enjoy open views of two mountain ranges in one direction and another mountain range off in the distance in the other direction. On clear days, which are rare, resident and visitors to this land can see to the Cajon Pass in the north and the Agua Tibia Wilderness to the South. Even with the proposed mitigations, how can the March JPA and developer say that the aesthetic impacts will be less than significant? Please spare me the code that allows you to do what you are planning; it simply rings hollow and shows a bias toward profit over quality of life and sustainable development practices. I-785.6

  As described above, aesthetics on a rational level will see all scenic vistas and the visual character of this land destroyed, and the persistent noise and light pollution (and air quality) emitting from this land do not lend themselves to enhancing or preserving beauty or value of this land. Why did the JPA and the developer evaluate aesthetics solely from a developmental perspective? Rationally, no one in the community likes these buildings, we do not find them artful or aesthetically pleasing. And the impact of these buildings and all their trucks intruding on the open space do not enhance the personal experience one can have in nature. Speaking from an aesthetics point of view, this plan does not promote an appreciation of natural or human made objects and therefore Table 1-2 is neglectful and dismissive of the residents of western Riverside County, especially the neighborhoods in eastern Riverside and adjoining unincorporated County land specifically. Will the March JPA demand that the developer proposes an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? And will the March JPA seriously consider Alternate Plan 1 that involves doing noting with this land? If not, what justification does the March JPA offer to not seriously consider Alternate Plan 1? It would be insulting and irresponsible to claim that this project must provide much needed jobs in Riverside County, that response is invalid, irresponsible, and misleading. I-785.7

- Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic I-785.8

presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction and without grade elevations of these buildings or boundaries in the draft EIR there is no way to determine the accuracy of them. What is there a reason the developer neglected to include grade elevations of these buildings? There are no buildings located in the Meridian complex today that look like these fictional images; these images are misleading to the public and demonstrate a dismissive viewpoint by the applicant. (The proposed views are inaccurate based on the size and number of buildings being proposed, as well as height factoring in grade elevations, which is not only a misleading presentation of the project but also dismissive of how the public values things like aesthetics and scenic vistas.)

Based on the description of aesthetics above, Figures 4.1-3 to 4.1-7 also do not satisfy the rational or experiential standard for beauty or value to anyone that has to live near them. How does the JPA and the developer justify the finding that there is less than significant impact to aesthetics with this project? While a bit of hyperbole, one would not view the Grand Canyon the same if there was a pile of garbage at the bottom of it. And when I ask this question, I am asking you to consider the people that live here, not building codes, land use guidelines, or the developer's profit margin. Why are there no grade elevations provided for all buildings and the perimeter? Is this an oversight or a neglectful and purposefully misleading representation?

I-785.8 Cont.

I'd remind you that you are bound by the General Plan, Goal 2, Policies 2.3 and 2.4 to "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." A racially, culturally, and economically diverse community of people will forever be negatively impacted by this project if developed as proposed. Why have you chosen to turn your focus away from these goals at this time? What justification can you offer concerned residents who have lost trust in the March JPA for these unfair and biased decisions? Where are your legal and moral obligations to the community surrounding March ARB? How will you hold the applicant accountable to propose more sustainable land use plans now and in the future just as Randall Lewis has advocated for throughout industry and via the lecture series that bears his name at UC Riverside?

I-785.9

- Section 3.5.2 Project Design Features focuses mostly on aesthetics and lighting or minimizing obstruction and light pollution. While PDF-AES-1 through 16 address the visual element related to aesthetics, they do not address other experiential aesthetic qualities impacted by these developments, things like noise and air pollution associated with noisy trucks that smell like diesel fuel. This oversight by the March JPA and the developer is again misleading to the public; it is neglectful to the people who live near or visit the Upper Plateau area, and it is dismissive of their aesthetic experiences related to

I-785.10

this unique landscape. Why didn't the project design features include non-visual aesthetics? Why do they not address the rational and experiential aesthetic qualities inherent in this land? Lastly, how does the March JPA defend the fact that this plan does not reflect any of the feedback the community has provided for nearly a year before the release of this misguided plan? It is appropriate, and I am calling for, further evaluation of the impacts on aesthetics related to non-visual pollution sources with criteria that consider the impacts to people not just data levels that codes recommend or measure.

I-785.10 Cont.

I-785.11

The draft EIR's consideration of aesthetics is decidedly one-sided and communicates a clear anti-community message to residents living near the Upper Plateau. Was this your intention? Will the JPA and the developer sanction a project that ignores the aesthetic appreciation of people who live her just so the applicant can meet the demands of its hedge-fund and non-local investors? How is this adhering to the spirit and guidance of the March ARB General Plan developed in the late 1990s?

I-785.12

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporate Riverside County have made one thing clear in response to the specific plan: **no more warehouses**. In every meeting, public engagement, and modification to your site plan you have ignored the community and you did so it seems intentionally. For a year we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

I-785.13

Fortunately, the group Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community that have realistic development opportunities for the JPA and the applicant.

1. <u>Alternate plan #1: The Campus Approach</u>
   - *Concept*: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
   - *Environmental Analysis*: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

I-785.14

- *Project Objectives*: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus not would not be connected under this plan).
- *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open-space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and a unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
   - *Concept*: A veteran's village that incorporates open-space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
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   - *Project Objectives*: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
   - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open-space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-785.14 Cont.

3. Alternate plan #3: The State or County Park Approach
    - *Concept*: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
    - *Environmental Analysis*: These public parks help revitalize communities impacted by the closure of the military bases, providing close to home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
    - *Project Objectives*: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
    - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offer residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

I-785.14 Cont.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area. Why have you ignored the community and relied on them to propose a land use plan for you? What steps will you take to engage the public in these alternate plans, especially when these alternate plans glorify a higher purpose instead of the applicant's profit goals? People must feel that the natural world is important and valuable and beautiful and wonderful and an amazement and a pleasure. I hope you recognize the higher calling for beauty, good, and value for all of God's people and reject the applicant's specific plan.

The March ARB General Plan was written more than 20 years ago, and established a goal of repurposing former military land for public benefit and use and to create more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-

I-785.15

warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationalists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors to the area beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

I-785.15
Cont.

May God lead your path,

Kevin Shearer
Riverside, CA 92508
shearer32@verizon.net

Letter I-785

Kevin Shearer
March 9, 2023

I-785.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-785.2 This comment summarizes the location of the Project site and lists various publicly accessible documents, including the Draft EIR. This comment is introductory in nature and does not raise an issue specific to the environmental analysis in the Draft EIR. As such, no further response is required.

I-785.3 This comment raises notes that the Project envisions a variety of uses but is concerned that most of the development associated with the Project will be warehouses and raises concerns about these impacts, in particular regarding aesthetics. The Project proposes the following mix of land uses on corresponding acreages, as indicated in Table 1-1 of the Draft EIR:

- Business Park – 65.32 acres
- Industrial – 143.31 acres
- Mixed Use – 42.22 acres
- Public Facility – 2.84 acres
- Parks/Recreation/Open Space – 78.00 acres
- Streets – 37.91 acres
- Existing Public Facility – 2.87 acres
- Open Space/Conservation Easement – 445.43 acres

For purposes of analysis, the Draft EIR assumed the following buildout scenario:

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1, 280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facility – 2.84 acres for future sewer lift station and electrical substation (within the Specific Plan Area)

As detailed in Table 3-2, Land Uses by Land Use Designation, of Recirculated Chapter 3, Project Description, the Industrial, Business Park, and Mixed Use land use designations permit a wide range of uses, including manufacturing, storage and distribution, office, and commercial uses. The Draft EIR evaluates warehousing as a dominant use under the Specific Plan buildout scenario because warehousing is one of the more intensive uses allowed under the Specific Plan. However, the only plot plans proposed under the Project are for Buildings B and C on industrial-zoned parcels; no specific development is proposed on the remaining parcels within the Campus Development. As such, through

the evaluation of the buildout scenario, the Draft EIR discloses the impacts of the Specific Plan at the maximum foreseeable level of development.

Additionally, this comment raises concerns about the relevancy of Appendix B to the Draft EIR and notes that Table 1-2 of the Draft EIR summarizes the impacts of the Project, including aesthetic impacts. Section 4.1, Aesthetics, of the Draft EIR and Appendix B, Meridian Upper Plateau Sight Line Sections, describe sight line sections that show existing and proposed grades at five sections through the Project site to match the locations of the viewpoints evaluated in the EIR. These sections were prepared to demonstrate the general scope of grading required for the Project as well as the elevations of the Specific Plan Area as they relate to the Conservation Easement and neighboring off-site residential areas. They show the topography of the Project at these locations under existing and proposed conditions. Appendix B also includes the photometric lighting analysis for field lighting that would be included in the Park component of the Project. Appendix B supports the analysis of the Specific Plan buildout scenario included in Section 4.1, Aesthetics, of the Draft EIR. Regarding Table 1-2, no specific comments, questions, or concerns about the environmental analysis included in the Draft EIR are raised. As such, no further response is provided.

I-785.4 This comment provides discussion on the importance of aesthetics and raises concerns regarding the aesthetics analysis in the Draft EIR. In addition, the comment questions the public engagement process for the Project, with respect to aesthetics.

Consistent with the requirements of CEQA, Section 4.1, Aesthetics, of the Draft EIR provides discussion of the Project site's existing visual character and surroundings, identifies State and local regulatory requirements, and evaluates potential impacts. The Draft EIR's analysis is based on significance criteria adopted by the lead agency, March JPA, and required by law under CEQA. The 2022 March JPA Local CEQA Guidelines is consistent with the State CEQA Guidelines published by the Governor's Office of Planning and Research. These guidelines have been updated in recent years to assess potential impacts of proposed projects on an objective basis. As such, the potential impacts presented in the Draft EIR are assessed utilizing existing and proposed guidelines and regulations governing aesthetics on the Project site and the March JPA Planning Area, including the proposed Specific Plan and its defined design guidelines, the General Plan, and the Development Code. Therefore, as further detailed in Section 4.1, Aesthetics, of the Draft EIR, impacts to existing visual character and quality of public views were found to be less than significant, whereas impacts to scenic vistas were found to be less than significant with mitigation incorporated. Please see Topical Response 1 – Aesthetics for additional information.

With respect public engagement, as summarized in Recirculated Chapter 2, Introduction, a Notice of Preparation for the Project was published on November 19, 2021, which started a public review period that ended on December 20, 2021. Comments received were considered as part of the preparation of the EIR. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. In addition, these responses to comments represent another instance in the CEQA process in which the public, agencies, and organizations have the opportunity to provide feedback on the proposed Project and the environmental analysis presented in the Draft EIR.

I-785.5 This comment objects to the Project as proposed and expresses personal opposition to the conclusions related to aesthetics. See more discussion under Topical Response 1 – Aesthetics. Specific comments regarding the Draft EIR are provided and responded to below.

I-785.6 This comment notes mountain ranges within the vicinity of the Project site's surroundings and questions the less than significant conclusions presented in the Draft EIR. The aesthetics analysis in the EIR is based on established thresholds. As explained in Section 4.1.4, Thresholds of Significance, the significance criteria used to evaluate the Project impacts related to aesthetics are based on the following thresholds contained in Form J of the 2022 March JPA CEQA Guidelines, which mirror the thresholds in Appendix G of the CEQA Guidelines. See Topical Response 1 – Aesthetics, for a discussion of the thresholds of significance selected by March JPA for evaluation of aesthetic impacts.

I-785.7 This comment states the proposed Project would result in impacts related to scenic vistas and visual character, as well as noise, light pollution, and air quality. These issue areas are analyzed in the Draft EIR within Section 4.1, Aesthetics (i.e., scenic vistas, visual character, and light pollution), Recirculated Section 4.2, Air Quality, and Section 4.11 Noise. As discussed above in Response I-785.4, the Draft EIR includes extensive analysis of the potential aesthetic impacts of the Project and concludes that its impacts will be less than significant with mitigation incorporated, in compliance with CEQA. Additionally, the comment requests "an alternate plan that truly considers aesthetics from the point of view of the people who live" in the Project vicinity. As discussed in Topical Response 1 – Aesthetics, and Section 4.1, Aesthetics, of the Draft EIR, five viewpoints were used to evaluate the Project's impacts in relation to scenic vistas and existing visual character and quality of public views of the Project site and its surroundings. As shown in Figure 4.1-2, Key Points Viewpoint Map, the five viewpoints used by the Draft EIR provide representative views likely to be experienced by residents. The alternatives presented in Chapter 6, Alternatives, of the Draft EIR – including the No Project Alternative – have been evaluated for potential aesthetic impacts and will be considered by March JPA in deciding whether to approve the Project. Similar to the analysis included in Section 4.1, Aesthetics, visual changes to publicly available views of the Project site were considered. Additionally, see Topical Response 8 – Alternatives, within which a new Alternative 5 – Non-Industrial Alternative, is presented and its aesthetic impacts are evaluated. Please see Response I-785.4 above for more discussion on the thresholds of significance required under CEQA for aesthetics.

I-785.8 This comment questions the presentation of the buildings depicted in the visual simulations as different from existing buildings within the March JPA Planning Area. As explained in the Draft EIR, to visually identify anticipated changes from public viewpoints surrounding the Campus Development, and to specifically identify if the Campus Development would have a substantial adverse effect on a scenic vista, visual simulations were prepared from the five key vantage points discussed above. To prepare the photosimulations, the five viewpoint photographs were used as a base layer in AutoCAD, and the Project buildout scenario was overlayed, including setbacks, height, materials, color palettes, and landscaping consistent with the plant palette and Design Guidelines in the proposed Specific Plan. For ornamental and screening landscaping within the Specific Plan Area, a 10-year growth factor was applied to each plant species.

The comment also suggests that the viewpoints do not include grade elevations or boundaries. The photosimulations accounted for the proposed grades and elevations within the Campus Development. Appendix B to the Draft EIR illustrates conceptual grading plans and sight line sections to support the

analysis of each viewpoint considered within Section 4.1, Aesthetics, of the Draft EIR. Please see Topical Response 1 – Aesthetics for further discussion.

I-785.9 This comment questions the Project's consistency with March JPA General Plan Goal 2, Policies 2.3 and 2.4, which calls for discouraging land uses that conflict with the services or plans of adjoining jurisdictions and protecting the interests of local residents and jurisdictions. The Project is consistent with Land Use Element Policy 2.3 because development of the Project would occur in a logical pattern of growth through the guidance of the proposed Specific Plan, compatible with adjacent land uses to the east and northeast. The Conservation Easement will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. The Project is also consistent with Land Use Element Policy 2.4 The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of the EIR. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses.

I-785.10 This comment asserts PDF-AES-1 through PDF-AES-16 are inadequate because they do not include non-visual features that would expand the scope of aesthetics. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. As detailed throughout the Draft EIR, the impact analysis is consistent with CEQA, the CEQA Guidelines, and the 2022 March JPA Guidelines. Thus, environmental review of aesthetics concerns the thresholds of significance as outlined in 2022March JPA CEQA Guidelines. See more discussion above in Response I-785.4. Other environmental issues areas referenced in the comment, such as noise and air pollution, are discussed and analyzed in other sections of the EIR: Section 4.11, Noise, and Recirculated Section 4.2, Air Quality.

I-785.11 This comment asserts the Project does not reflect community feedback. This comment is similar to comments made above. See Response I-785.4 above for more discussion on the public review process under CEQA. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices.

I-785.12 This comment asserts the Draft EIR's impact analysis on aesthetics is inadequate. This comment is similar to comments made above. See Response I-785.4 above regarding the Draft EIR's analysis of aesthetic impacts and compliance with CEQA. Further, the comment questions the Project's consistency with the General Plan. See Response I-785.9, above, and Recirculated Section 4.10, Land Use and Planning, for an analysis for the Project's consistency with the relevant goals and policies of the March JPA General Plan.

I-785.13 This comment expresses opposition to proposed warehouses on the Project site and requests alternatives without these land uses. Chapter 6, Alternatives, of the Draft EIR considered and evaluated four alternatives to the proposed Project. All except Alternative 1 (No Project) would have industrial land uses (i.e., warehouses). The Draft EIR considered an All Residential Alternative but rejected it from consideration as it would not meet the basic Project objectives outlined in Section 6.2. Moreover, the March JPA General Plan currently designates the Project site as Business Park and Parks/Recreation/Open Space. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. The General Plan does not include land zoned for new residential uses because the purpose of the jurisdiction is to increase employment opportunities within the region. In addition, see Topical Response 8 – Alternatives, which includes analysis of a new Alternative 5 – Non-Industrial Alternative.

I-785.14 This comment is Form Letter H, Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

I-785.15 This comment expresses opposition to the proposed Project and summarizes the comments made within Comment Letter I-785, which are responded to above.

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Comment Letter I-786

From: Jerry Shearer <shearer32@verizon.net>
Sent: Thursday, March 9, 2023 4:54 PM
To: Dan Fairbanks
Subject: Public Comment: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: PublicCommentWestCampusUP-draftEIR-S3.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project. Please find the attached letter. I look forward to your thoughts and appreciate your consideration.

Please reply to confirm receipt of this public comment.

Sincerely,

Brenda Shearer
Riverside 92508

8 March 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- General Plan of the March Joint Powers Authority, assumed March 11, 1997 date
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

I-786.1

As a naturalist and casual birder, I have had the privilege of traveling the western United States and observing the incredible diversity of life in our little part of the planet. In my many expeditions, I have seen firsthand the devastating effects that human development can have on wildlife, and I am writing to express my opposition to the proposed construction of a warehouses proposed for the Meridian West Campus Upper Plateau area.

I-786.2

The proposed site for this warehouse complex is home to a wide variety of birds, from the majestic Cooper's Hawk to the delicate Burrowing Owl. These birds, like so many species around the world, are facing increasing threats from human activities, and the construction of these warehouses would only add to these pressures.

I-786.3

The destruction of native vegetation, which provides food and shelter for these birds, is one of the most immediate and obvious impacts of warehouse construction. The loss of this critical habitat would leave many birds with limited or without any the resources they need to survive, and would have devastating consequences for local bird populations.

I-786.4

Furthermore, the noise and light pollution generated by these warehouses would further disrupt the birds' natural rhythms, behaviors, and nesting making it even more difficult for them to survive in the area. And this is merely a reflection of surveyed species in the draft EIR. There are many more visitors to this land that rely on the open space and natural resources as they migrate from location to location. Species observed on this land include the Canadian Goose, the Great Egret, a variety of hummingbirds, the Wilson's Warbler, the Common Ground Dove, and the Turkey Vulture.

I-786.5

As someone who has spent considerable time studying and protecting the natural world, I urge you to consider the impact that these warehouses would have on local bird populations, and to find alternative locations for these buildings or find alternate land use plans that would not have such severe consequences for wildlife. Always putting human interests first when developing land use plans is irresponsible and does not fall in line with the sustainable development reputation that Randall Lewis (the applicant) promotes in the lecture series bearing his name at UC Riverside. Nor is this project consistent with the policies and innovation espoused by the programs bearing his name at Claremont McKenna College (the Randall Lewis Center for Innovation and Entrepreneurship) or La Verne University (the Lewis Center for Entrepreneurship). Please explain to me how the hope and forward-looking policies and programs discussed at these centers for learning are demonstrated by the proposed mega-warehouse plan for the West Campus Upper Plateau. (See alternate plans below.)

Further, please explain how this disastrous plan falls in line with Mr. Lewis's public statements in the Student Life News from 2020? "Innovation exists everywhere," Lewis said. "It's not necessarily charismatic leaders who drive innovation but the companies and organizations who have systems for innovation, who are thinking, 'How can we be better? How can we use existing resources differently?'" Placing a mega-warehouse complex that is largely speculative investing for hedge-fund managers, Wall Street investors, and international business does not meet the standards for Mr. Lewis's words or wishes for the future of California. It also does not meet the standards for a healthy environment that works in harmony with local residents and the economy. Building warehouses today is the furthest thing from being innovative or a leader. Please explain to me how this plan demonstrates a value to the public (outside of a few low paying and seasonal warehouse jobs). How is this plan an example of the applicant innovating

I-786.6

(aside from placing nearly 5 million square feet of warehouses inside of a community of homes)? And how is this plan promoting the entrepreneurial spirit for small and local businesses? The answer clearly is that it does none of those things. So, what else does this plan lack?

I-786.6 Cont.

In addition, the draft EIR does not properly analyze the land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections impacted by this plan. It fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I-786.7

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.
3. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
4. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence.
5. The draft EIR omits a thorough study of reptiles, specifically the study needs to evaluate the impact of construction on migration of snakes, brumation, species variety and reproduction, and prey habits. There is a rich community of reptiles on this land and the draft EIR negligently ignores them and their benefit to the landscape, environment, and local community. As a resident who watches for the migrating coachwhips in early May, I know I would lose a sense of what makes living near this unique land so special.

I-786.8

The public cannot trust that we are not destroying rare animal, bird, and plant life unless a more thorough survey is conducted, one that is done over a more representative timeframe that includes the local variations in seasonal temperatures, migration, and rainfall. I request the developer and its consultants produce a more complete survey of the life forms that call this land home at one time or another. I also request they JPA, the developer, and its consultants survey

local residents to assess the value of uninterrupted open space, not the kind provided for in the 2012 Center for Biological Diversity settlement, but the type of open space that allows animals to move freely throughout a landscape without the disruptions of traffic, light, noise, and water pollution associated with industrial development.

I also request that you determine what will happen to this land when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? If the land falls within the County, what support and finances exist to keep up this land and permit the open space to remain in its natural undisturbed state? How can you ensure the public that these mitigation measures will be enforced? Saying it will be done by the next agency is like passing the cost of balancing the budget to the next generation of tax payers. What specific plans does the March JPA have developed? When will these plans be available to the public? And what enforcement mechanisms are or will be in place to ensure we are not eradicating more life forms due to human activities? And why do your plans in the EIR not line up with the County's standards for siting and developing industrial and warehouses?

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporate Riverside County have made one thing clear in response to the specific plan: **no more warehouses**. In every meeting, public engagement, and modification to your site plan you have ignored the community and you did so it seems intentionally. For a year we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, the group Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community that have realistic development opportunities for the JPA and the applicant.

1. <u>Alternate plan #1: The Campus Approach</u>
    - *Concept*: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
    - *Environmental Analysis*: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

- *Project Objectives*: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus not would not be connected under this plan).
- *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open-space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and a unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
   - *Concept*: A veteran's village that incorporates open-space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
   - *Environmental Analysis*: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
   - *Project Objectives*: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
   - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open-space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach
    - *Concept*: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. “Airman State Park” would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
    - *Environmental Analysis*: These public parks help revitalize communities impacted by the closure of the military bases, providing close to home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
    - *Project Objectives*: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
    - *Conclusion*: Per the General Plan’s goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offer residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area. Why have you ignored the community and relied on them to propose a land use plan for you? What steps will you take to engage the public in these alternate plans, especially the one that preserves open-space and habitat so critical to plants and animals that rely on this land to live? People must feel that the natural world is important and valuable and beautiful and wonderful and an amazement and a pleasure.

The March ARB General Plan was written more than 20 years ago, and established a goal of repurposing former military land for public benefit and use and to create more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB.

I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to

public benefit and the natural environment. This large industrial mega-warehouse development holds no aesthetic beauty or real-world value to residents of and visitors to western Riverside County. It offers minimal low-paying jobs (which your EIR erroneously assessed) in exchange for destroying a public recreation areas and valuable open space for plants and wildlife to exist. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

"Do not let what you cannot do interfere with what you can do."

Brenda Shearer
Riverside, CA 92508
shearer32@verizon.net

Letter I-786

Brenda Shearer
March 9, 2023

I-786.1 This comment summarizes the Project vicinity and the documents reviewed by the commenter. The comment does not raise any specific issues with respect to the content and adequacy of the environmental analysis included in the Draft EIR; as such, no further response is provided.

I-786.2 This comment summarizes a personal experience and general opposition to the proposed Project. This comment does not raise any specific issues with respect to the content and adequacy of the environmental analysis included in the Draft EIR; as such, no further response is provided.

I-786.3 The comment raises concerns regarding the Project's potential impacts to bird species, including Cooper's Hawk and burrowing owl. Impacts to bird species, including Cooper's Hawk, are evaluated in Section 4.3, Biological Resources, of the Draft EIR and determined to be less than significant with mitigation incorporated. This comment does not raise any specific issues with respect to the content and adequacy of the environmental analysis included in the Draft EIR; as such, no further response is provided.

I-786.4 The comment raises concerns regarding the Project's potential impacts on bird habitat. As discussed in Section 4.3, Biological Resources, of the Draft EIR, impacts on avian habitat would occur with the implementation of the proposed Project; however, impacts on nesting birds would be less than significant with the implementation of MM-BIO-7 and impacts on native habitat would be less than significant with the implementation of MM-BIO-8. Cumulative impacts on local birds were determined to be not significant with mitigation.

I-786.5 The comment raises concerns regarding the Project's potential impacts on bird species associated with noise and light. Indirect impacts of light were assessed as part of this analysis and MM-BIO-3 (Operation-Related Indirect Impacts to Special-Status Wildlife) and MM-BIO-4 (Stephens' Kangaroo Rat Avoidance and Mitigation) reduce the potential impact of light on native wildlife species: (1) Construction activities will be limited to daylight hours. Construction lighting will be shielded away from surrounding natural areas. Fixtures will be shielded to downcast below the horizontal plane of the fixture height and mounted as low as possible. (2) Permanent night lighting shall be directed away from proposed open space and/or suitable habitat for special-status species to protect species from direct night lighting. Shielding shall be incorporated in Specific Plan designs to ensure ambient lighting is not increased. Any trails that intersect proposed open space will not include night lighting.

Potential noise impacts on sensitive avian receptors were assessed as part of the analysis and is provided in Section 4.3, Biological Resources, of the Draft EIR and sections 4.3.2 and 5.3 of the Project Biological Technical Report (Appendix D-1). MM-BIO-2 (Least Bell's Vireo) and MM-BIO-3 restrict construction and operational noise levels within riparian habitats.

I-786.6 This comment requests consideration of alternatives without warehouses. The commenter also questions how this development complies with objectives identified in lecture series at UCR and at Claremont McKenna College. The comment does not raise any specific issues with respect to the content and adequacy of the environmental analysis included in the Draft EIR; as such, no further

response is provided. However, please see Topical Response 8 – Alternatives, for a discussion of Project alternatives.

I-786.7 This comment is a general opinion regarding the adequacy of the CEQA analysis and personal concerns and also notes the lack of a non-industrial alternative. In response, see Topical Response 8 – Alternatives.

I-786.8 The comment raises concerns regarding the Project's potential impacts on wildlife and plant species, including those located within the Western Riverside County Multispecies Habitat Conservation Plan. Comment bullets 1 through 4 are similar to Comments FL-C.4 through FL-C.7 of Form Letter C – Biological Resources. In response, please see Form Letter C Response. Regarding comment bullet 5, as explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), habitat assessments were performed for all special-status species, including reptiles, in compliance with CEQA requirements (please see section 3.4.2 of the Project Biological Technical Report [Appendix D-1]). Although suitable habitat for red racer (e.g., red coachwhip) is present, this species is not considered rare, endangered, or threatened and impacts on this species are not required to be individually assessed under CEQA. Evaluations of the communities on the Project site were not intended to be exhaustive, but to provide sufficient information for decision makers to understand the environmental consequences of the proposed Project. With impacts on native vegetation communities present on the Project site, it is assumed that species inhabiting those communities would also be impacted, including reptiles. Impacts on these native upland vegetation communities and the species they support would be mitigated through purchase of credits at an approved mitigation bank.

I-786.9 The comment raises concerns regarding the validity of the biological surveys conducted for the Project. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), the studies presented in the Project Biological Technical Report (Appendix D-1) are not intended to be exhaustive of all life forms that occur or have occurred on the proposed Project site. CEQA does not require the lead agency to perform all research. The Project Biological Technical Report (Appendix D-1) provides decision makers with information which enables them to make a decision which intelligently considers potential environmental consequences of the proposed Project. The study provides information from a snapshot in time and may not be exhaustive of all common (non-listed) species that may occur; however, all habitats were assessed and all special-status species with potential for occurrence were addressed in the analysis.

The CBD Settlement Agreement (Appendix S) presents the decisions agreed upon by the Center for Biological Diversity and San Bernardino Valley Audubon Society, organizations that are staffed by experts in the field of environmental law and conservation biology, and March JPA and LNR Riverside LLC. The conclusions drawn in the Settlement Agreement were based on adequate consideration of all impacts resulting from realignment of the previous March Air Force Base and proper valuation of the land regarding biological resources. See Topical Response 4 – Project Consistency, for further discussion of the CBD Settlement Agreement.

I-786.10 This comment raises concerns regarding the transfer of land use authority from March JPA to the County of Riverside. In response to this comment, please see Topical Response 9 – Long Term Project Implementation and Enforcement.

I-786.11 This comment is Form Letter H, Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

I-786.12 This comment is the last two paragraphs of Form Letter A, Aesthetics. In response to this comment, please see Form Letter A Response.

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From: Jerry Shearer <shearer32@verizon.net>
Sent: Thursday, March 9, 2023 5:07 PM
To: Dan Fairbanks
Subject: Public Comment: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: PublicCommentWestCampusUP-draftEIR-S2.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project. Please find the attached letter. I look forward to your thoughts and appreciate your consideration. I-787.1

Please reply to confirm receipt of this public comment.

Sincerely,

Christopher Shearer
Riverside 92508

8 March 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

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My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- General Plan of the March Joint Powers Authority, assumed March 11, 1997 date
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

I object to many things found in the draft EIR, but it does show one thing quite clearly; the March JPA and Dudek spared no expense in developing this monstrous document. The technical writing, subject area specialists, consultants, and graphic designers must have spent considerable time and cost quite a bit of money throughout the development of this land use plan and project proposal. And in some ways, their expertise and skill are quite good, making something so unpopular at best and completely deceitful at worst shine as the nice portfolio piece that it is. But

I-787.3

in so many ways, this document is a work of fiction. Why does the JPA and the applicant insist on misleading the public with a document containing so many errors and omissions? I-787.3 Cont.

The project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The warehouses would be sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool (which your initial study and draft EIR neglect to identify) and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the project as consistently requested by the community. I-787.4

As a member of the community, I am disappointed that none of the alternative development plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies? I-787.5

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. I-787.6

II-v). In what specific ways have you incorporated Community Preference in the development of your plan? As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses.

The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated, "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred. Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear.

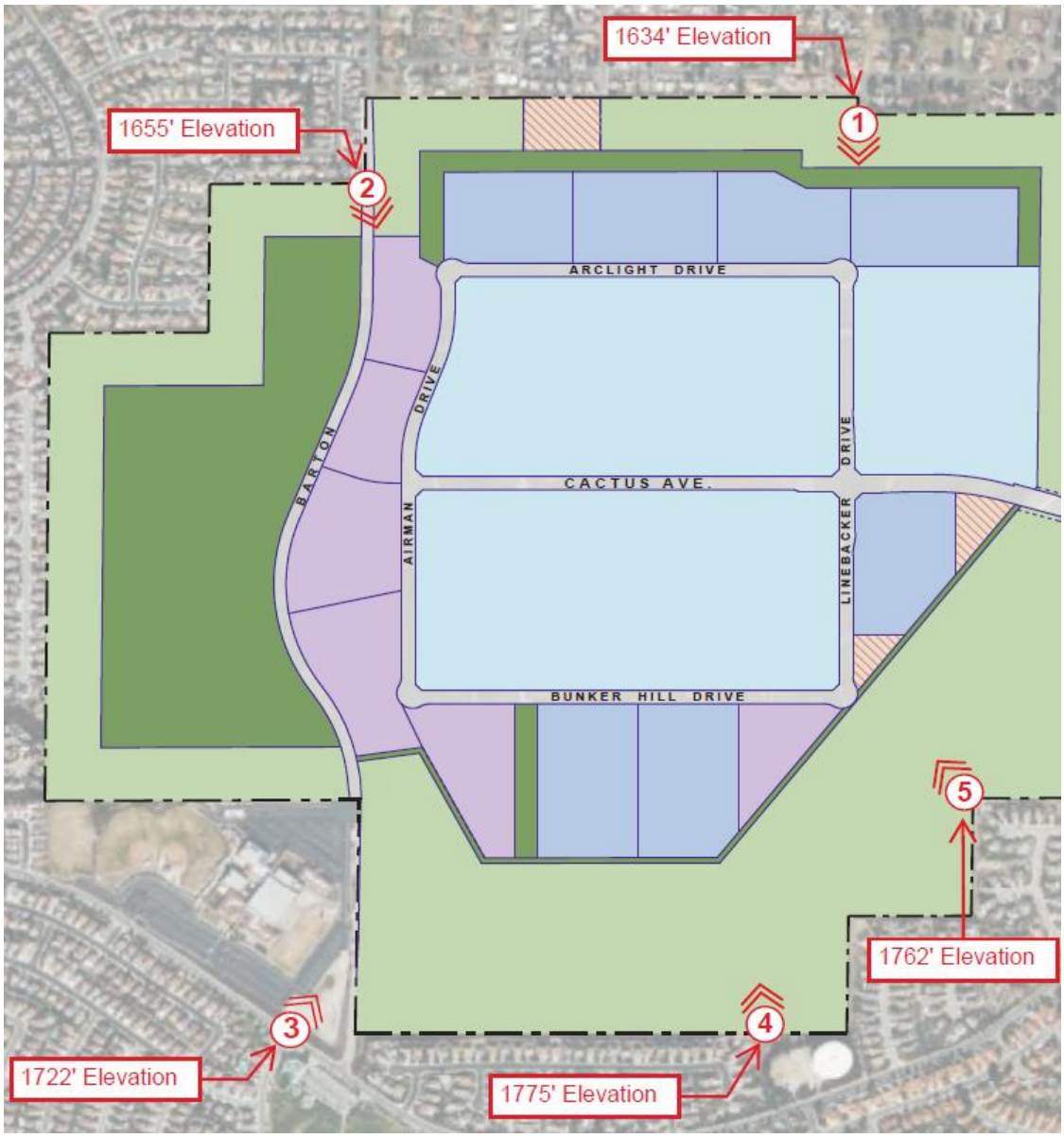
I-787.6 Cont.

The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process. With these objections in mind, it is appropriate to take some time to consider the inaccurate and misleading information provided in the draft EIR for public consideration. Gathering feedback on this type of inconsistent and erroneous documentation is either sloppy work or purposefully dismissive of public concern and requests.

Let's look more closely. Figure 4.1-2 identifies key points that illustrate what the views are today and will be once the project is complete. I object to this section as misleading and inaccurate. First and foremost, this image provides elevations for scenic vistas but not building elevations to

I-787.7

compare the views to today. It combines satellite imagery with an overlay that is one dimensional and misleading to the public. This image doesn't show contour, landscape changes, and fails to communicate the enormity of the space and of these buildings on the land. And without grade elevations of each building and the perimeter of the complex, this image does not adequately portray the dramatic impact this project would have on the area from simply an aesthetics standpoint. Why did the JPA and applicant not provide this information for public consideration? I hope to demonstrate a possible answer in this letter.



Let's explore this further: the draft EIR provides creatively composed images of present and proposed views in Figures 4.1-3 through 4.1-7. That is where those talented graphic artists and

I-787.7 Cont.

overly creative project managers come in handy. I equate the images in these figures to the experience of seeing the original Superman movie and then comparing it to a modern Batman movie, modern CG makes it a totally different experience for viewers just like your artists have created something fictional for the public, something we will never experience.

View #1, Figure 4.1-3 shows the following existing and proposed views:



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PROPOSED

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Cont.

Yet if one merely turns 90-degrees from this same location, one gets a current view of warehouses build by the March JPA and the developer.



This image from the same location shows precisely what the JPA and the developer have provided on previous similar warehouse projects. Where is the landscaping that your graphic designers added to Figure 4.1-3 above? How does the yellow and white blend in with the dramatic landscape and backdrop of the Box Spring and snow-covered San Bernardino mountains? How do the multi-colored containers blend with the seasonal green of the floral in December through April? Why would anyone believe that the view provided in Figure 4.1-3 will look like the proposed version and not the real views that exist in this area today? How is this not a significant impact to aesthetics and views for residents and visitors alike? Your document claims mitigation but the proof is in what you already have done and there is no mitigation being done on existing warehouses under the JPA and this developer. What enforcement exists for the developer when they fail to sufficiently mitigate impacts and the project is complete? Why is there no plan in place to detail remedies for poor development standards and practices? It is reasonable to all who live in this area to demand an enforcement plan and significant in-kind contribution by the applicant to mitigate their existing intrusive development practices, and a plan for the Joint Powers Commission to implement for all future monitoring and enforcement of these neglectful practices.

I-787.7
Cont.

View #2, Figure 4.1-4 shows the following existing and proposed views:



EXISTING



PROPOSED

I-787.7
Cont.

This is where the graphics team shined. I'd almost believe that I was going to have a garden and a natural walking path to enjoy near these warehouses. So much green in the proposed image that it makes one believe that the JPA is in fact making my life healthier by building high-polluting warehouses near thousands of homes, a large church, and a pre-school (the one omitted in the initial study and draft EIR). But this image is also fictional. What is missing here is the real view of what will happen under this project near the newly opened Barton Road. This road will pass

within 50 feet of homes, a neighborhood that straddles the line between the City of Riverside and unincorporated (for now) County residents. There are a couple of other obvious errors in the proposed graphic: for one there is not that much room to the right of the road in the image. If this were a real image, the photographer would have been taking the picture from the block wall of one of the closest neighbors. And just how close is that building to their homes? The Site Plan in Figure 3-5 states it is 300 feet but there is no way that is true based on the Site Plan map and a measuring tape that shows the road and these proposed smaller warehouses would be closer than that. This image is irresponsible and misleading. Why is the JPA and developer willing to put residents of Riverside and the County at risk in this way? Why would they significantly impact their views and the aesthetics of this land as it stands at the connection of existing and future Barton Road as seen below? Your document claims mitigation to lessen the significance of the impact to aesthetics here but the proposed view in Figure 4.1-4 is a work of fiction.





This project will irreversibly negatively impact residents bordering this land. If built as proposed, the newly opened Barton Road and neighboring warehouses would offer around the clock noise

I-787.7 Cont.

I-787.8

and light pollution to residents in ways that alternate plans would not. Why hasn't the JPA and the applicant proposed any alternate plans that do not include industrial?

I-787.8 Cont.

View #3, Figure 4.1-5 shows the following existing and proposed views:



EXISTING



PROPOSED

I-787.9

The grandeur of the vista from Grove Community Drive is one of the most amazing scenic points in all of Riverside. The sweeping vista of Box Springs and San Bernardino mountains on a clear

day (apparently even a graphic artist can't erase the visible air pollution cause be the dramatic cumulative effects of industrial sprawl) is unparallel in this region. Once again, the proposed image in Figure 4.1-5 is fictional and is not consistent with existing JPA warehouse projects. For starters, the fictional element is that the proposed image does not include the correct number, size, or placement of warehouses proposed in the EIR, and it does not include grade elevations to site the warehouses at a trustworthy height for the public to consider. There are at least five smaller building visible from this viewpoint on the site plan and there isn't nearly enough space in that plan for the type of tree cover and vegetation shown in Figure 4.1-5. That alone makes the proposed image inaccurate and misleading to the public.

About those mature trees and landscaping in Figure 4.1-5, they exist nowhere else in the JPA's territory, so at best you have taken creative license here and at worst you have an intentionally misleading representation of the project for the purposes of persuading the public and the commission that the impacts of developer on aesthetics and scenic vistas surrounding this plan are adequately mitigated and will not adversely harm surrounding residents and their quality of life. Since the West Campus Upper Plateau is a highly prized piece of land to the community, a place of recreation and family and community harmony, why is the JPA and the developer so eager to put warehouses in a place with such significant and calming aesthetics that are found nowhere else in western Riverside County? No number of projected (not actual) jobs can replace the value of this land for residents and visitors to it.

I-787.9 Cont.



And why should residents believe the JPA when you have never delivered the promises you made to the community in similar EIR documents, project plans, and community outreach meetings for existing warehouse developments? What part of the images provided below demonstrate that the JPA and its developer are trustworthy neighbors, people who will honor their commitment to protect the aesthetics and scenic vistas for the residents of western Riverside County? One only needs to look at past examples to predict what will happen in the future. Where are the mitigations in the images below? Mature trees? Most of these warehouses are 4-6

I-787.10

years old. How about the preservation of scenic vistas? Before these warehouses were built, I could see the March ARB runway from the tops of these small hills. Now I am luck to hear the March ARB runway over the persistent logistics noise from the tops of these same small hills.





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Cont.



One last comment on Figure 4.1-5, why is it that the existing and proposed images of this viewpoint both have mildly hazy skies? Is this the result of a coastal marine layer/onshore flow? Not that I am a meteorologist, but those clouds look to be cirrostratus, cirrocumulus, or altostratus clouds which are generally mid to high level clouds that occur at altitudes of 20,000 feet and above. So no, it doesn't look like this image has a marine layer in it, rather this is good old southern California smog, the kind of pollutants that are caused in part by the same diesel trucks shown in the images above and that you proposed to amplify in our neighborhood and increase on our freeways. There is no way that this project will not significantly impact the aesthetics and scenic views of this area as proposed today. What will the JPA do to correct the misleading and erroneous renderings of this project? They are highly misleading to the public and do not accurately represent what the JPA and applicant have built for years of land use upscoping the original intentions for this land. You don't get to continue to claim that jobs are the reason the general plan was created while ignoring the other reasons it was created in order to satisfy your greedy and dishonest development practices.

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It is worth repeating here, under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

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View #4, Figure 4.1-6 shows the following existing and proposed views:



EXISTING



PROPOSED

The first image below shows just how scenic the views are of the West Campus Upper Plateau. From residents' homes, one can see green hillsides, rolling hills, and on clear days like this one, one can see all the way to the Ontario warehouse giga-plex and line of semi-trucks heading north up the Cajon Pass. It is difficult for the public to imagine the proposed image above because it is not something can see today. It is misleading and it does not exist anywhere within the JPA's developments today. The image perspective is that of a person standing in the field looking at the buildings rather than of the neighbors living adjacent to this project. It is misleading because it is

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not what people will actually see if the project is built. It is misleading because you do not provide grade elevations for all buildings with the draft EIR and this view specifically will see the most direct impact of the obstructive buildings and semi-truck burdened streets of Barton and Cactus (and I don't just mean the trucks driving past, I mean the ones parked or idling nearby illegally since there is no enforcement plan in place to prevent this from happening).

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A few other errors in the fictional image include there will not be mature trees surrounding it (there are none surrounding existing JPA warehouses today, see image below for proof), the grade of the pad the buildings are placed on in the image is not what the grade will be for the project, and once again the size, number, and type of buildings in these images is not consistent with the Site Plan in Figure 3-5. How as public representatives can you allow the developer to say that there is a less than significant impact to these scenic vistas? The trees next to the yellow warehouse below are several years old. They don't cover half of the height of that building and there are not enough of them to actually mitigate the impact these warehouses will have on aesthetics and scenic vistas. What would you do to ensure that this project is different and significantly better than ALL of the other JPA projects? Again, why is there no enforcement plan in place for the Joint Powers Commission to hold the developer and occupants of these warehouses accountable for their illegal or disruptive behaviors? How is approving more warehouses protecting and preserving the aesthetics of this land?

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View #5, Figure 4.1-7 shows the following existing and proposed views:



EXISTING

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PROPOSED

In the case of the misleading images in Figure 4.1-7 above, there are no viewpoints anywhere in the JPA controlled and redeveloped land that has an unobstructed view after building industrial on it. This proposed image is dishonest and misleading to the public. While not all from the Upper Plateau area, the following images show just what an intrusion and disruption of scenic views these warehouses are in this area (and real images should be worth more than fake ones).



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Cont.







I-787.14
Cont.

Interestingly enough, the scenic vistas and impacts on aesthetics for this plan don't consider all of the scenic views of the Upper Plateau. It might be relevant to consider what nearly five million square feet of industrial buildings and the necessary infrastructure would do to other scenic views of this area and from different viewpoints than were provided in the draft EIR.

The following images show the view from Cactus Ave. heading into the Upper Plateau area.





While not taken under the best lighting conditions, they are good enough to show the scope of the land from a different angle and view. Once again, the images and graphic representation of the proposed development are misleading and irresponsible. Real images, such as the ones here, of this land provide a better representation of this land and its surroundings.

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Cont.

As these images show, the elevation gain from Cactus to the top of the Upper Plateau is more significant than the other images or the draft EIR indicate. Because of this significant change in elevation, the developer would need to remove even more of this land to make it so the roads rise at a gentler grade to allow semi-trucks and their cargo easier access to the warehouses. This significant rise in elevation also means these trucks will make more noise accelerating going uphill and braking going downhill. It means removing more dirt in just the construction of the road than is detailed in the draft EIR. It means destroying the mountain bike and hiking trails in the area to accommodate the grade of the extension of Cactus. It means destroying the natural drainages, plant and animal habitats, and the characteristic of this unique piece of land.

It is from this view that the public will notice a significant and unavoidable impact to the aesthetics and scenic vistas of the Upper Plateau. Why has the JPA chosen to over build this area around Cactus and Meridian with warehouses? Why is it insisting on adding nearly five million sq. ft. of additional industrial space here? Does the JPA and the developer view the aesthetic character and value of this land to be purely derived by development codes? Allowable under law? Or does the JPA consider and care about the people who live and drive in this area daily? Do you value the public's interest in this grand landscape as much as you value the profit you and the developer will derive from more industrial development? Please detail for me a non-jobs-based justification for developing on this land and misleading the public as to the impacts it will have on their lives.

I-787.14 Cont.

Another interesting item to note in these images is the black tire marks on the road. I know you are aware of the significant amount of car and motorcycle racing that takes place in and around these existing warehouses. The evidence of this illegal activity is seen throughout the JPA controlled Meridian Business Center and the connecting roads.



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It is difficult for the public to understand how the 40 hours of patrol time by the Riverside Sheriff's department paid for by the JPA is preventing this kind of illegal activity, but it seems to be the answer provided by the March JPA whenever a community member asks for help stopping this unaccounted for noise pollution and illegal and damaging activity. So again, I point to the images you provided in the draft EIR and ask why you have purposefully misled the public to believe that your plan will look anything like your graphic designers say it will? As far as I can tell, there is no plan to mitigate the things, such as overnight racing and drifting, that are indirectly caused by the development you proposed. Because your draft EIR is insufficient in the area of public safety and lacks a way to measure and mitigate noise pollution of this type, I request a more thorough review, documentation, discussion, and solution to the problems you are creating with this misleading and erroneous draft EIR.

I-787.15 Cont.

With one final look at this landscape, in winter before the rains turn the plans green and the mountains white, this view is rare in southern California. It is rare in western Riverside County. It is rare in such an urban area to have so much open space that allows residents to shed some of the stress and anxiety they store up from their daily lives, horrible air quality, and overbearing road and highway traffic (at all times of the day and night). This image is a jewel even in its brown phase. Why does the JPA and the developer want to destroy it? Why is the JPA turning its back on the community it is tasked with serving? And why is the JPA willing to continue to destroy a community that was once strongly centered on March AFB? Does it really come down to "jobs" and "economic growth"? I am having a difficult time believing you right now.

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Frankly, I am disappointed that none of the alternative plans consider non-industrial uses, and that the images found throughout the draft EIR mislead the public so blatantly. Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings which I attended. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. The Project is incompatible with the General Plan, Final Land Use Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

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For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporate Riverside County have made one thing clear in response to the specific plan: **no more warehouses**. In every meeting, public engagement, and modification to your site plan you have ignored the community and you did so it seems intentionally. For a year we have asked for alternate plans

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that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, the group Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community that have realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
   - *Concept*: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
   - *Environmental Analysis*: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
   - *Project Objectives*: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus not would not be connected under this plan).
   - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open-space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and a unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
   - *Concept*: A veteran's village that incorporates open-space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with

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low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

- *Environmental Analysis*: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
- *Project Objectives*: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
- *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open-space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

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3. <u>Alternate plan #3: The State or County Park Approach</u>
   - *Concept*: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
   - *Environmental Analysis*: These public parks help revitalize communities impacted by the closure of the military bases, providing close to home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
   - *Project Objectives*: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
   - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an

ecologically diverse habitat and landscape, and offer residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area. Why have you ignored the community and relied on them to propose a land use plan for you? What steps will you take to engage the public in these alternate plans? Will you have the courage to preserve this landscape for future generations, saving a tiny part of southern California from the developer's blade and blasting, in the name of health and happiness? I-787.18 Cont.

While the March ARB General Plan was written more than 20 years ago, and you have publicly stated that it is a guideline rather than a requirement for the JPA to follow it, you owe it to the public the plan was created to help to do something solely in our interest. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. The general plan was the government's best effort to do something positive for Riverside, Moreno Valley, and Perris residents who directly felt the blow of decommissioning the March base. Ask anyone that does not work for you, has the JPA achieved their mission of revitalizing the community surrounding the Base? Has the JPA made Riverside, Moreno Valley, Perris, and the unincorporated County a better place to live and work? Has the JPA improved people's (not you or your contractors) lives? Your misleading economics report fail to tell the real story of destruction and degradation of community the JPA is engaged in today. I-787.19

I urge the March JPA to reject any specific plan that includes warehouses in any zoning type as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process. The March JPA and the applicant have a duty to adhere to the March ARB General Plan and Final Land Use Plan and to follow the vision established in these documents. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations be developed, limiting the negative impacts developing this land will have on the residents who will have to live with this development. Please don't allow one final grand act of poor land use planning be your lasting legacy. You can do better and you have people willing to help you realize a positive path forward for this land. I await your detailed response. I-787.20

Namaste (catch you later),

Christopher Shearer
Riverside, CA 92508
shearer32@verizon.net

Letter I-787

Christopher Shearer
March 9, 2023

I-787.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-787.2 This comment summarizes the location of the Project site, as well as notes the comment letter is based on the availability of various publicly accessible documents, including the Draft EIR. This comment is introductory in nature and does not raise issues on the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-787.3 This comment expresses general opposition to the Project. The comment does not raise specific concerns regarding the adequacy of the environmental analysis in the Draft EIR. Specific comments regarding the Draft EIR are provided and responded to below.

I-787.4 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment also incorrectly suggests that the Draft EIR neglects to identify that the Project site is located approximately a quarter mile from a preschool. As stated in Recirculated Chapter 3, Project Description, Grove Community Church Preschool is located on the Grove Community Church campus, which is approximately one-quarter mile southwest of the Specific Plan Area. The preschool is also discussed in the environmental analysis; for example, in Section 4.1, Aesthetics, the Draft EIR states: "The closest school to the Project site is a preschool, located at the Grove Community Church approximately one-quarter mile southwest of the Project."

The comment also raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts, but does not raise specific issues, concerns or questions about these environmental analyses in the Draft EIR.

This comment requests a non-industrial alternative to the Project. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated.

I-787.5 This comment is the same as the second and third paragraphs of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-787.6 This comment is the same as the remainder of Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-787.7 This comment suggests Figure 4.1-2, Key Points Viewpoint Map, should include additional information such as contour, landscape changes, and grade elevations of each building and the perimeter of the complex. However, the purpose of Figure 4.1-2 is to provide locational and directional orientation context for the five viewpoint photographs used to illustrate existing conditions and the Project

photosimulations. Contrary to the comment, the elevations provided in Figure 4.1-2 are not for scenic vistas, but rather the elevation at the location where each viewpoint photograph was taken. The Specific Plan Area and the Conservation Easement are shown for informational purposes so that the reader can understand what portion of the Project each viewpoint is capturing. The additional information requested by the comment is detailed in Section 4.1, Aesthetics. The Project site ranges in elevation approximately from 1780 feet above mean sea level (AMSL) at the center of the site to approximately 1640 feet AMSL and 1560 AMSL along the western and eastern portions of the site, respectively. According to conceptual grading plans (Appendix B), after the Specific Plan Area is graded, Campus Development buildings would be built on level sites that with finished floor elevations ranging from 1,702 AMSL to 1,731 AMSL. Therefore, assuming the maximum building height of 50 feet, Campus Development buildings, as a worst-case scenario, would have a maximum building height elevation as high as 1,781 AMSL. Sight line sections were prepared for the Project that show existing and proposed grades at five sections throughout the Project site. These sections were prepared to demonstrate the general scope of grading required for the Project as well as the elevations of the Specific Plan Area as they relate to the Conservation Easement and neighboring off-site residential areas (see Appendix B). Section locations were selected to match the locations of the viewpoints described above to show the topography of the Project at those locations under existing and proposed conditions. Section 4.1, Aesthetics, describes the contour and existing gradient for each viewpoint.

This comment objects to the photosimulations presented in the Draft EIR. To prepare the photosimulations, the five viewpoint photographs were used as a base layer in AutoCAD, and the Project buildout scenario was overlayed, including setbacks, height, materials, color palettes, and landscaping consistent with the plant palette and Design Guidelines in the proposed Specific Plan. For ornamental and screening landscaping within the Specific Plan Area, a 10-year growth factor was applied to each plant species. The photosimulations accounted for the proposed grades within the Campus Development.

With regard to Viewpoint No. 1, the comment includes a picture facing east towards existing industrial development as "what the JPA and the developer have provided on previous similar warehouse projects." However, the development depicted is on the west side of Brown Street, which is outside the March JPA Planning Area boundaries (see Exhibit 1-2, Cantonment Boundaries, of the March JPA General Plan). Neither March JPA nor Project applicant were involved in the identified development. The Project would be constructed in accordance with the proposed Specific Plan, which includes design guidelines and standards, providing the site planning, landscaping, and architectural theme within the proposed Specific Plan guidelines on architectural design, landscape design, streetscapes, walls and fencing, and signage. The photosimulation included as Figure 4.1-3, Viewpoint No. 1, of the Draft EIR and referenced in the comment utilized a maximum building height of 50 feet as well as an earlier version of the Specific Plan Area site plan where four larger business park buildings would be constructed instead of seven smaller business park buildings. Figure 4.1-3 has been revised in the Final EIR to reflect a 45-foot building height and the construction of smaller-scale buildings under the Project buildout scenario.

The comment further suggests Viewpoint No. 2 is misleading based on the existing location of Barton Street. As part of the Project construction, Barton Street would be extended to connect with the existing City of Riverside street network to the north and south of the Specific Plan boundary. Barton Street would be realigned to be a 66-foot Collector design classification pursuant to the City of Riverside General Plan Circulation Element, consisting of a 66-foot wide right of way with 40 feet of curb-to-curb

pavement width providing for a single 13.5-foot travel lane, a 1-foot striped median, and a 6-foot bicycle lane in each direction. A 6-foot curb adjacent sidewalk will be provided on each side of the street. In addition, a 17-foot wide LLMD easement will exist along the west side of the roadway, providing for a 10-foot-wide multi-purpose trail, as well as a 5-foot landscape buffer that will be associated with a 7-foot-wide landscape buffer and drainage swale located within the street right-of-way. Figure 4-8 of the proposed Specific Plan details the Barton Street Streetscape and Figure 4-7 details the Barton Street Plant Palette. As shown in Figure 3-5, Site Plan, of Recirculated Chapter 3, Project Description, there would be 300' of buffer between the northernmost Mixed Use parcel and residential uses.

The comment raises concerns regarding the implementation and enforcement of mitigation for the Project. The proposed Project would be built in accordance with the design standards outlined in the proposed Specific Plan and compliance would be ensured through the plan check and permitting process. Please see Topical Response 9 – Long-Term Project Implementation and Enforcement for further discussion regarding enforcement of mitigation measures.

I-787.8 This comment states the Project and the Barton Street extension would result in adverse impacts related to noise and light pollution "around the clock." The Draft EIR analyzes the Project's effect on lighting in Section 4.1, Aesthetics, and determined less than significant impacts with mitigation incorporated. Similarly, the Draft EIR analyzed the Project's noise effects within Section 4.11, Noise. PDF-NOI-1 ensures construction activities would cease from 7:00 p.m. to 7:00 a.m. the following day, with shorter hours within 500 feet of a residential area. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. During operations, the impact analysis determined operational noise would be less than significant at the nearest noise-sensitive receptor. No mitigation is required. Regarding Barton Street, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue.

The comment also raises concerns regarding alternatives to the Project. See Topical Response 8 – Alternatives, for more discussion, including a no-warehouse alternative as suggested by the comment.

I-787.9 This comment asserts Viewpoint No. 3 provided in the Draft EIR from Grove Community Drive, as shown in Figure 4.1-5 is inadequate and that the image is not consistent with existing projects nearby. See Response I-787.7 above and Topical Response 1 – Aesthetics for discussion on the visual simulations. Section 4.5.5 Landscape Design Guidelines, of the Specific Plan and Section 9.17.040(D) require 40 feet on center tree spacing, a minimum size of 24-inch box trees in public ROW, and on-site landscape trees shall be a minimum of 60% 24-inch box trees and 40% 15-gallon trees. Finally, on-site trees shall be a minimum of 80% evergreen, and no more than 20% deciduous. For ornamental and screening landscaping within the Specific Plan Area, the photosimulation applied a 10-year growth factor to each plant species, which is standard practice given the long term nature of development. The comment also raises concern for air pollution from the cumulative projects in the region. Recirculated Section 4.2, Air Quality, analyzed cumulative effects and determined impacts would be cumulatively considerable and significant due to the Project's contribution and exceedance in regional VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$ emissions during operations. No changes or revisions to the Draft EIR are required in response to this comment. Lastly, the comment questions the Project's employment generation. See Topical Response 5 – Jobs, for more discussion.

I-787.10 This comment expresses opposition to past projects within the Project site's vicinity and opposition to the proposed Project. The comment raises concerns for impacts to aesthetics and air pollution. The comment asserts the visual simulations are inadequate. See Responses I-787.7 and I-787.9 above for more discussion. Please see Recirculated Section 4.2, Air Quality, for further discussion regarding air pollution.

I-787.11 This comment references Planning Process C1F of the Final Reuse Plan and questions public engagement. March JPA used Planning Process C1F to develop the Preferred Land Use Plan outlined in the Final Reuse Plan. The March JPA General Plan was then developed based on that Preferred Land Use Plan. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Additionally, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated.

I-787.12 This comment raises concerns about the public vantage points used in the viewpoints, specifically in Figure 4.1-6. As shown in Figure 4.1-2, Key Points Viewpoint Map, the five viewpoints used by the Draft EIR were taken from public spaces but also provide representative views likely to be experienced by residents. The comment alleges the photosimulations are misleading. See Response I-787.7 and Topical Response 1 – Aesthetics for discussion on the visual simulations.

The comment raises concerns for truck parking and idling along Barton Street and Cactus Avenue. Regarding Barton Street, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The comment asserts there would be no enforcement. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. See also Recirculated Section 4.2, Air Quality, for further discussion regarding air quality and mitigation measures, including idling restrictions.

I-787.13 This comment raises concerns for the visual simulations in the Draft EIR, in particular the representation of mature trees as compared to other projects under existing conditions. The comment provides a photo of an existing industrial development. However, the development depicted is on the west side of Brown Street, which is outside the March JPA Planning Area boundaries (see Exhibit 1-2, Cantonment Boundaries, of the March JPA General Plan). Neither March JPA nor Project applicant were involved in the identified development. The Project would be constructed in accordance with the proposed Specific Plan, which includes design guidelines and standards, providing the site planning, landscaping, and architectural theme within the proposed Specific Plan and guidelines on architectural design, landscape design, streetscapes, walls and fencing, and signage.

The comment raises concerns regarding the implementation and enforcement of mitigation for the Project. The proposed Project would be built in accordance with the design standards outlined in the proposed Specific Plan and compliance would be ensured through the plan check and permitting process. Please see Topical Response 9 – Long-Term Project Implementation and Enforcement for further discussion regarding enforcement of mitigation measures.

I-787.14 This comment questions the visual simulations in Figure 4.1-7 and states there will be no viewpoint without warehouses. The Draft EIR identified project design features and March JPA Development Code provisions that would ensure compliance with applicable regulations. See Response I-787.7 above and Topical Response 1 – Aesthetics for further discussion on the visual simulations, an explanation of the Project's aesthetic impacts, and March JPA's application of the thresholds of significance. The commenter also stated that there will be a significant and unavoidable impact to aesthetics from Cactus/Meridian Parkway. This is not a recognized viewpoint or scenic view within the General Plan, and as such impacts from this viewpoint were not evaluated.

With regard to grading, pursuant to the proposed Specific Plan, a conceptual grading design will be required for each Tentative Map application consistent with the March JPA Development Code, and grading designs will implement the goals and policies of the March JPA General Plan. Grading in the Specific Plan Area will balance, meaning no import or export of soils. Figure 6-9, *Conceptual Grading Exhibit,* in the proposed Specific Plan shows the proposed grading for each individual parcel in the Specific Plan area. Among other requirements, the Grading Plan Development Standards in the proposed Specific Plan require the overall shape, height, and gradient of any cut and fill slope to be designed to be consistent with the existing natural contours and scale of the natural terrain to the extent feasible. As set forth in Section 4.6, Geology and Soils, of the Draft EIR, the Project would incorporate MM-GEO-1, which requires all grading to be performed in accordance with the grading guidelines outlined in the March JPA Development Code and the proposed Specific Plan, among other measures.

The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with

active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

With respect to noise impacts, as disclosed in Section 4.11, Noise, of the Draft EIR, the Project would not generate substantial temporary or permanent increases in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Segment 13, which passes through industrial development and is a non-sensitive receiving land use, meaning that there are no nearby sensitive receptors, including residential uses. As such, this impact, while significant and unavoidable, would not impact any residential or other sensitive uses in the vicinity of the Project. All Project noise impacts to residential uses would be less than significant.

I-787.15 This comment raises concern for street racing within the Project site's vicinity and asserts existing police protection services would be indirectly impacted due to the proposed Project. The comment's assertion is speculative. Under existing conditions, the isolation and sparse development surrounding the Cactus Avenue cul-de-sac can be attractive to individuals wishing to engage in such activities. Under the proposed Project, this cul-de-sac would be eliminated, and Cactus Avenue would extend to the Project site. Project traffic would significantly reduce the times when that area is isolated, thereby relieving pressure on local law enforcement. Impacts to public services, including police protection, were analyzed in the Draft EIR under Section 4.13, Public Services. The Project is not anticipated to adversely affect service ratios or response times for police services, through payment of required Development Impact Fees, such that new or expanded police facilities would be required. Therefore, the Draft EIR determined the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities; impacts would be less than significant, and no mitigation is required. Similarly, the comment's assertion on street racing-related noise is speculative. No changes or additions to the Project description or analyses included in the Draft EIR are required.

I-787.16 This comment expresses general opposition to the proposed Project and concern regarding the existing open space that benefits residents in the area. The Project consists of two components: the Specific Plan Area and the Conservation Easement. The approximately 370-acre Specific Plan Area includes the remnants of the March AFB Weapons Storage Area which has consistently been fenced off to prevent public access. The remainder of the Project site will be preserved in the approximately 445-acre Conservation Easement, which includes undisturbed land and trails the public has accessed for passive recreation purposes. As detailed throughout the Draft EIR, there is no development proposed within the Conservation Easement and no physical alteration is anticipated, and the Conservation Easement would provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.

I-787.17 This comment claims the Project site was never intended to be an industrial zone and references the Final Reuse Plan. As discussed in Recirculated Section 4.10, Land Use and Planning, the March JPA General Plan implements the Final Reuse Plan and designates the Project site as Business Park, Industrial, and Park/Recreation/Open Space. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in

Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of the EIR. The Conservation Easement would provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. Please see Recirculated Section 4.10, Land Use and Planning, and Topical Response 4 – Project Consistency, regarding consistency with the March JPA General Plan goals and policies and the Good Neighbor Guidelines for the City of Riverside and County of Riverside. As discussed in Recirculated Section 4.10, Land Use and Planning, the purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses.

The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. The Project is compatible with the surrounding land uses. The comment further requests an alternative based on community feedback. See Topical Response 8 – Alternatives, for more discussion, including a no-warehouse alternative.

I-787.18 This comment is Form Letter H, Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

I-787.19 The comment further asserts the Project is not consistent with the March JPA General Plan. Please see Recirculated Section 4.10, Land Use and Planning, for more discussion on the Project's consistency with the relevant goals and policies of the General Plan.

I-787.20 The comment expresses general opposition to the proposed Project and any warehouse use within the Specific Plan Area. As this comment does not raise any specific issues with respect to the content and adequacy of the environmental analysis within the Draft EIR, no further response is provided. Specific comments regarding the Draft EIR are addressed above.

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From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Thursday, March 9, 2023 5:11 PM
To: Dan Fairbanks
Subject: Public Comment: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: PublicCommentWestCampusUP-draftEIR-S1.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project. Please find the attached letter. I look forward to your thoughts and discussing them with you further, and I appreciate your consideration and time during this process. I-788.1

Please reply to confirm receipt of this public comment.

Sincerely,

Jerry Shearer
Riverside 92508

8 March 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- General Plan of the March Joint Powers Authority, assumed March 11, 1997
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

I-788.2

For the purposes of this comment letter, I will refer to the March Joint Power Authority (JPA) which includes the Commission members, the developer that is understood to be LNR Riverside, LLC, Meridian Park West, LLC, the Lewis Group of Companies (partners and subsidiaries), and member entities the cities of Riverside, Moreno Valley, and Perris, and the County of Riverside.

The West Campus Upper Plateau is a unique piece of land. It is an extension of the Sycamore Canyon Park natural area geographically, historically, culturally, environmentally, and

recreationally. There is no other place like it in western Riverside County. Any development of this land should complement the unique characteristics and value (human value, not just economic value) of this land not destroy it. As much as the applicant via this draft EIR tries, this industrial development plan and land use zoning do not preserve the landscape even with the inclusion of the 2012 agreement that sets aside open space and a conservation easement. Viewing this land from a settlement map or a parking lot don't begin to do adequate justice to its human value. The public wants to understand your thoughts on taking this special piece of land away from residents of western Riverside County and turning it over for private development. The establishment of the 2012 settlement does not adequately reflect how people value and enjoy this land currently. This warehouse project is not like other warehouse projects and it will have a significant negative impact on the community it borders regardless of the developer's mitigation efforts and claims.

There are many clear and obvious errors, omissions, misrepresentations, and discrepancies in the draft EIR. I write this letter to call attention to as many of them as I can, especially those that to me, my family, and my community are the most egregious. My concerns focus on the following areas and items of the draft EIR:

1. A clear disregard for the 2012 and 2003 settlements, and the destruction of a unique natural habitat and ecosystem in western Riverside County.
2. The lack of authentic community engagement and involvement when making decisions that impact people's lives, and the lack of enforcement mechanisms or policies in place for existing and future warehouses within the JPA jurisdiction.
3. The continued privatization of public lands surrounding March ARB and throughout southern California.
4. The omission of non-industrial alternative plans in spite of public demands.
5. Misleading and inconsistent baseline information used to develop this plan.

I-788.2 Cont.

The Settlements: Center for Biological Diversity (2012) and CCAEJ (2003)

The damage and disturbance to this unique piece of land is unquestionable. The draft EIR admits as much throughout the impacts and mitigations described in several locations of the draft EIR. The climate and extreme weather events of the past few years, from severe drought in California to unprecedented rain and snowfall in early 2023, the fact that our climate and weather patterns are changing is unquestionable. Anyone paying attention can hear the environmental alarm bells ringing, warning us of changes to our lives that we may not be prepared to handle, and that we may well be contributing to on a daily basis with our life choices. It is not my intention to argue climate change related to the West Campus, Upper Plateau project, but it is my intention to question why the JPA and developer feel it is imperative to eliminate more open space and natural landscapes in the name of greed and predatory capitalist practices. Where in the March ARB General Plan are you tasked with harming people who rely on the land around them? Where does it instruct you, the commission, or the developer to ignore the value and aesthetics of

I-788.3

open-space for the sake of open-space? And more importantly, how does this specific plan begin to comply with California's push to net zero emissions standards?

I-788.3 Cont.

To this end, there are two settlement agreements in place within the JPA and they affect any plans put forward and then developed by the JPA and developer including the West Campus Upper Plateau. The **September 2012 agreement** with the Center for Biological Diversity and San Bernardino Valley Audubon Society (S.D. Cal No. 09-cv-1864-JAH-POR) provides for a conservation easement or water quality open space area to be managed as a wildlife habitat for sensitive species and riparian areas. The purpose of this settlement is to preserve this land for light recreation use, for archaeological and historic purposes, and for the safeguarding and conservation of native plants, animals, and topography. Aside from providing the 2012 settlement as Appendix S, can you explain to the community how the JPA is adhering to the scope of this agreement with this plan?

According to Tables 1-2 and 1-3 of the draft EIR, some of these areas will see "significant and unavoidable" impact due to this project. These items include air quality, cultural resources, noise, and tribal cultural resources. In each instance, these unavoidable items are in conflict with the 2012 Settlement Agreement.

There seems to be many inconsistencies especially in area of preservation of habitat under the 2012 agreement. The first environmental alarm bell centers around a blatant disregard for the preservation of species on this land. For example, the culverts (see the 2012 Slope Maintenance Exhibits) under Cactus are insufficient and will not accommodate all animals in their migration between Sycamore Canyon north and south areas. Similar wildlife corridors along the 101 freeway in California, Wallis Annenberg wildlife crossing, the Irvine-Laguna Wildlife Corridor and Greenbelt, the I-15 wildlife crossing in Temecula, and the I-10 wildlife crossing connecting the San Bernardino and San Jacinto wildernesses are (a) more numerous giving wildlife options for crossing at different locations, proposing two culverts is negligent wildlife and conservation planning on your part, and (b) larger or wider allowing for small and medium sized animals to move freely without feeling confined or forced into an uncomfortable setting that may restrict their movement and condense the gene pool of many threatened species. These successful corridors improve bio- and genetic diversity which will help ensure a healthy riparian habitat in the Upper Plateau. Granted these examples include must larger roadways, but the idea remains the same especially considering a large number of vehicles traveling on Cactus, Alessandro, and other roads surrounding the Upper Plateau will be semi-trucks that are unable to stop quickly and will undoubtedly cause an increase in deaths of small animals and reptiles living in and visiting this environment.

I-788.4

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

I-788.5

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. The applicant should disregard any of the wildlife studies over a year old. My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.
3. The applicant should consistently account for species and their vulnerability throughout the document. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
4. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence.
5. The draft EIR omits a thorough study of reptiles, specifically the study needs to evaluate the impact of construction on migration of snakes, brumation, species variety and reproduction, and prey habits. There is a rich community of reptiles on this land and the draft EIR negligently ignores them and their benefit to the landscape, environment, and local community.
6. The draft EIR does not account for migratory birds sufficiently. At different times of the year, residents and visitors can view geese, ducks, egrets, eagles, vultures, and a host of songbirds as they use the Upper Plateau to migrate from one place to the next. Why does the study of birds not include the migratory nature of birds making use of this land?
7. The draft EIR does not account for migratory butterflies, cicadas, and tarantulas, among other insects. Some of these insects are beneficial to our community from an aesthetics point of view and some of them simply kill other invasive pests. Why were these items omitted from the draft EIR? Along with the migratory and beneficial insects, the construction process will drive many of the less than desirable insects already in the open space into people's homes. Ants and mosquitoes (some carrying West Nile Virus) will be driven from their homes and into closer contact with people. Why does the draft EIR not include mitigations for residents impacted by this invasion? This is not imaginary, and happened to my house when you last built warehouses so close to people's homes. What responsibility does the JPA take for increasing my pest control bill?

I-788.5 Cont.

The public cannot trust that we are not destroying rare animal, bird, and plant life unless a more thorough survey is conducted, one that is done over a more representative timeframe that includes the local variations in seasonal temperatures, migration, and rainfall. I request the

developer and its consultants produce a more complete survey of the life forms that call this land home at one time or another. I also request they JPA, the developer, and its consultants survey local residents to assess the value of uninterrupted open space, not the kind provided for in the 2012 Center for Biological Diversity settlement (which is open space in name only), but the type of open space that allows animals to move freely throughout a landscape without the disruptions of traffic, light, noise, and water pollution associated with industrial development.

I-788.5 Cont.

Under the Terms of the 2012 settlement agreement, item B Defendant-Intervenors' Obligations, subitem 1a on page 4, the agreement establishes, "That any currently existing service roads within the Conservation Areas…can continued to be utilized by the public for passive recreation." Subitem 1b on page 4 refines this to say that public access these roads can be restricted if the land management agency deems the access a threat to "conservation value or public safety." Yet Figures 3-2, 3-3, 3-4, and 3-5 (Site Plan) clearly show a plan that will infringe on and limit public access to existing trails and roadways in the Upper Plateau area. You are in all likelihood aware of this requirement and believe that your plan adequately complies with the terms of the settlement agreement, but I fail to understand how. The construction of Cactus alone will destroy several hiking and biking trails in the area frequently used by the public for active and passive recreation. The large-scale demolition needed to level grades associated with roadways and building foundations will clearly impair access to these trails and roads and may eliminate some of them entirely. I like walking in this area, hiking into places that make me feel like I am somewhere outside of civilization. These trails that I and many residents enjoy hiking on will be destroyed by the construction. How is this not in violation of the 2012 agreement that quite clearly calls for maintaining existing roads and trails? I hope subitems 2 and 3a are not the answer to my questions here as they seem subjectively contrary to the idea of conservation and to the items identified in 1a and 1b.

I-788.6

I also question the status of subitem 7. What has LNR Riverside, or the applicant, done to establish and fund this endowment to date? Please provide establishment dates, payment dates and amounts, corresponding permit dates, and progress toward the $2 million funding level projected for April 1, 2027. Since the signing of this agreement, depending on your sources, inflation has risen 22%-30%. The funding obligation may have been fair in 2012, but today the number is about 25% behind. Is there precedent and a need to increase the funding level to align with the construction value and time period? What role does the JPA and commission have in requiring a fair financial settlement from the applicant who has waited to develop this land more than 10 years? Also, please indicate if the applicant has missed deadlines for funding or permits, what accountability exist for their actions, and what would happen if the applicant defaults on this obligation. What would need to happen for all parties regarding this settlement to allow for the BRAC-Park alternate plan I have identified below? Lastly, what happens to this agreement once the JPA sunsets at the end of June 2025? The nature of this question isn't who takes over the land management function, it is more what legal obligation will exist when the applicant is not longer tied to the March JPA? Does the developer's DDA transfer along with its entitlements to the County or the MSHCP to ensure conservation is the primary focus of this set aside land?

I-788.7

I-788.8

I-788.9

The **August 2003 agreement** with Center for Community Action and Environmental Justice places conditions for further development of the March Business Center. The conditions include a reduction of semi-truck emissions (which frankly are outdated by today's air quality standards), increased use of bio-diesel and alternate clean burning fuels (with the advances in EVs, there has to be some application here), improve landscaping and scenic vistas from the Orangecrest neighborhood, amend land uses for lots 16-18 and 54-56 to exclude logistics warehouses, limit semi-trucks on Van Buren Blvd (which certainly did not happen), and provide public amenities that include community, regional, and open space parks, and police and fire sub-stations. How is the proposed project complying with the requirements of the 2003 settlement? Specifically, how does this plan account for the amended land uses on lots that exclude logistics warehouses?

I-788.10

According to Tables 1-2 and 1-3 of the draft EIR, some of the requirements in this settlement will see "significant and unavoidable" impact or were completely ignored by the EIR. The decision to leave this agreement out of the draft EIR is concerning. Can you explain to me and the community how the JPA is adhering to the scope of this agreement with this plan? There seems to be many inconsistencies especially in area of supporting the lives of residents of Riverside in the 2003 agreement.

The first area I have serious concerns about is the traffic section of the document. The traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. Since the 2003 settlement agreement specifies that you work to reduce traffic on these streets, and you have not included this settlement in the draft EIR, it is clear that you do not intent to adhere to the settlement requirements and guidelines. How do you justify not considering the main truck traffic routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Why don't you consider the cumulative impacts for traffic within a five-mile radius of this project? Ignoring it is irresponsible.

I-788.11

I-788.12

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

I-788.13

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

I-788.13 Cont.

Your plan also does not account for the noise pollution associate with idling semi-trucks. While not explicitly part of traffic patterns or congestion, it is part of vehicles moving to and from the warehouses. Many of these trucks sit idling for 20 or more minutes and according to you that is illegal. Yet there are virtually no enforcement mechanisms in place to prevent them from doing this, and there certainly is no acknowledgement of this problem in the draft EIR. You and I have traded many emails, phone calls, and in-person conversations about this problem yet there is no solution. I bring this up now because it also seems like a violation of the 2003 settlement agreement in the areas of reducing truck emissions and reducing truck traffic on our streets.

I-788.14

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

I-788.15

I-788.16

Community Engagement: Decision Making and Enforcement of Policy

Building on this idea that the plan is inconsistent or insufficient with the two agreements that pertain to any development plans by the March JPA, residents believe that the JPA is working for the builder rather than the residents of western Riverside County. How can you claim otherwise when you advocate for their business and allow them to propose development plans that do not support your main goals in the General Plan? This development project poses many

I-788.17

concerns for local residents, the people of the Cities of Riverside, Moreno Valley, and Perris, and western Riverside County including air and water pollution, increased crime and traffic, an increase of homeless and vagrant camps as seen near many of the warehouses along the 215 corridor and on existing March JPA developed land, a loss of aesthetics and scenic vistas for this natural area, it detracts from or limits economic opportunity for home owners and places undue financial burden on them to repair construction caused damage to their homes and exposure for people and appliances like HVAC and pool filtration systems to higher levels of "significant and unavoidable" pollution (p.1-81), a lower quality of life for humans and non-humans alike, and a significant burden on and health risk for residents.

I-788.17 Cont.

Of the approximately 817.9-acre area, your plan calls for 250.85 acres for Mixed Use, Business Park and Industrial (143.31 acres) development, 523.43 acres designated as Park, Open Space, and Open Space Conservation (445.43 acres), and 40.75 acres for roadways and public facilities. After reviewing the draft Environmental Impact Report dated January 9, 2023 in some detail, you have clearly demonstrated how this project benefits the public. Your claim that this is bringing jobs and industry for people that live near this space is complete nonsense (see comments below) and I believe you know it. I have some serious concerns about your draft EIR and what looks like (at least per your working and reworking of the CEQA process) the JPA intentionally acquiescing to the developer on all ideas and decisions related to the former redevelopment March AFB lands. Why aren't your mitigation efforts supported by evidence?

I-788.18

For one, the JPA has never genuinely engaged the effected communities (of which I am a member and I currently deal with the daily adverse effects of your advocacy for unrestrained logistics sprawl). For proof one only needs to look at the ongoing fiasco of your plans with the area around the Air Force Village West. Warehouses right next to a retirement village, one that houses veterans? Who thinks this is a good idea? How does the JPA defend such decisions if not that you are allowing the developer (might I remind you the applicant is ONLY concerned with profit margin and to think otherwise is purposeful nativity) to do as they please, unchecked. As it relates to the West Campus Upper Plateau, the draft EIR refers to "A public scoping period was held to solicit input on the scope of the analysis for the EIR between November 19 and December 20, 2021. Additionally, an open house scoping meeting was held by March JPA on December 8, 2021. The purpose of this meeting was to seek input from public agencies and the general public regarding the potential environmental impacts of the proposed Project" (p.1-13). As someone living on the perimeter of this proposed project and will be directly impacted by your construction insensitive construction plan for more than four years, where was my invitation to participate in this meeting? Where were invitations to any of the more than 1,000 homes in the area? In fact, where was my invitation to attend planning and community meetings for any of the warehouses that impede my views, give off excessive light and noise pollution, and are the cause of an increase in migraines for both me and my son?

I-788.19

These warehouses did not exist when I bought my home and they were not planned, the JPA maneuvered around the community and revised land use plans to build warehouses against the

I-788.20

wishes or sometimes knowledge of the community. In fact, these changes to your General Plan Land Use Plan have gotten so far out of hand that the 5-10% of space set aside for industrial and warehouses has grown exponentially (I do not know the figure but believe it is more than 50%). Had anyone who bought these homes, anyone who paid a premium to have a home that bordered such a grand open space and natural area known that within five years we would be rewarded with views of warehouses and the sound and smell of illegally idling semi-trucks, I am sure that most people, me included, would not have bought a home here. The lack of genuine engagement implies you purposefully neglected to inform residents (and municipalities) of your plans. It also implies that you are likely flying by the seat of your pants and proposing land use zoning based on whatever the developer tells you is in demand at the time. The nature of their non-competitive contract with you is shameful, one that I view as criminal but also one that I rarely see in government work where contacts must be awarded to the business with the lowest price for the best value to the government. How is this any different? Why does the public, whose land this is/was, have to pay and settle for whatever a sole source bidder wants to build? This is a disturbing pattern for your para-private-government operation. The practice of conducting business in private that directly impacts the public is unethical, unfair, and seemingly is a violation of the public's trust (if not a misuse of tax dollars). Please explain to me how the Air Force, the State of California, and the US Government allows the JPA to negatively harm the public in this way.

I-788.20 Cont.

Per the JPA's website, on February 24, 2022 you hosted a public Q&A forum online, virtually via Zoom where you did not permit people to speak with you instead forcing people to comment or ask questions via the website's chat. You did not monitor that chat appropriately or professionally, ignored comments and questions at your discretion (much like you did when you failed to protect the health of residents by choosing to site warehouses within 200 feet of people's homes in Riverside along Barton Road), and you allowed a member of your commission to berate residents (also a disturbing pattern for this commissioner as he professed to represent the JPA and the USAF) who questioned or expressed frustration with your plans. If you would have listened to this first public discussion of your plan one year ago, you would have heard a common and consistent message: no more warehouses. **No more warehouses!**

Again, per the JPA's website, on August 18, 2022 you hosted a presentation of the proposed plan at an open house at the March Air Museum. This event was open to the public and the public believed we were going to be able to discuss the plans with you, provide meaningful feedback on the plans, and work together to meet the goals of the JPA's mission and the needs of the community that surrounds this land. Wrong again. The event turned into a show by the JPA and developer and became quite heated. Again, one of your commissioners, who said publicly that he was there to learn more about the project, stood with you and the builder as he argued with residents for more than an hour. How is this type of engagement productive or genuine? If you, and I know because I listened to you intentionally mislead residents at your station that night, had listened to residents at this second gathering five months ago, you would have heard that same common and consistent message: no more warehouses. **No more warehouses!**

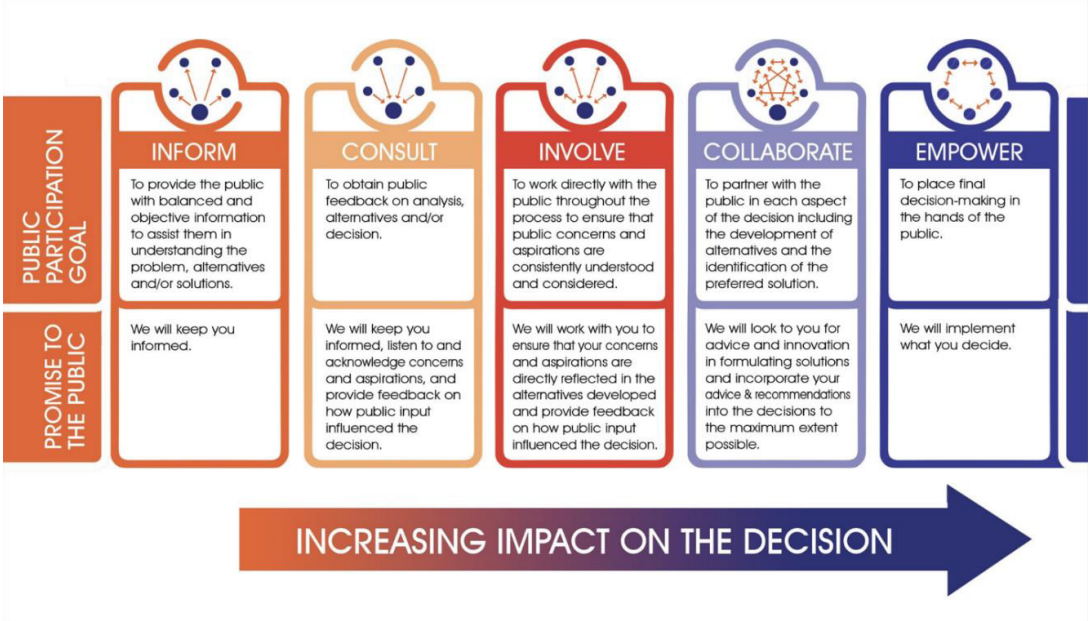
I-788.21

At a public meeting on January 11, 2023 held at the Moreno Valley Conference Center, 40 residents spoke against this project. Directing their words to the commission, they spoke honestly, emotionally, and factually about their continued desire to have a plan that excluded industrial and logistics sprawl. No more warehouses they demanded. I spoke that night and questioned the JPA's insistence on providing development and land use plans that included solely industrial and logistics. I asked why no alternate plan was offered. I also asked for the convening of a Public Advisory Board to the JPA much like the TAC severs today. Since that time, our requests have been "heard" by the JPA but no action has been taken. How is this genuine public engagement? Where in this story so far have the voices of the public been acted upon? They have not. **No more warehouses!**

In a final show of public engagement, the developer hosted another public showing of the project and their plans to develop the Upper Plateau. This meeting was held again at the March Air Museum on February 9, 2023 and involved nothing more than a live reading of the project. The applicant did its best to justify the warehouses but few from the public attended. I was one who did and found the meeting insulting and less than authentic. It is quite clear to someone who has attended as many of these meetings in person as possible, the JPA and developer have no interest in considering alternate land use plans, nor have you ever considered them in the past, and this meeting was more box checking to say that you gave the public time to share their thoughts. This again was an act, a misrepresentation of what it means to engage the public, and I believe it was done with the intention of misleading the public to view the project and applicant positively.

I-788.21 Cont.

The image below comes from the Environmental Protection Agency. It describes what public engagement looks like at the federal level.



I-788.22

The JPA has clearly kept the public in the inform category despite the many public meetings that you claim you have held over the last year. You have never ventured beyond informing the public of your plans and have never empowered people to help make decisions about their lives. You, someone who does not live here, unilaterally make decisions for me. How is this just, legal, reasonable? Do you even understand what I am saying? I think you do and have chosen to ignore me hoping to see this through without consequence to you personally.

I-788.23 Cont.

On a more personal note, I live within 800 feet of several of your warehouses today. I have contacted the JPA and your office many times to request help with bad warehouse tenants and illegal public activity within your jurisdiction.

1. On January 22, 2023, I submitted a public request form asking the JPA for all correspondence in support of the West Campus Upper Plateau project. After two extensions to the time for response from Ms. Carmago and Mr. Fairbanks, I still have no answers other than a phone call that says the JPA likely has no such correspondence.
2. On January 30, 2023, I emailed the March JPA and Commission with a complaint about the warehouses near my home. I detailed the air, light, and noise pollution caused by these warehouses and asked you what from my experiences give me confidence that the proposed Upper Plateau development would be any different than what currently exists under the JPA's management today. I also asked what accountability exists for the lack of mitigations to these problems. After several emails with the JPA, I am still left wonder what is being done as I observe these problems continuing even today. Regarding these exchanges, how and where they the JPA be monitoring the noise from in relation to the existing warehouses, and how will these enforcements be applied to future developments like the mega-warehouses at Upper Plateau? How can residents access the data that the JPA will collect to confirm that the noise, light, and air pollution being monitored is represented accurately? This applies to existing and future warehouse developments. And What noise levels are considered unacceptable by JPA ordinance? How do these levels impact residents and wildlife? And what enforcement exists today and in the future to prevent significant noise, air, and light pollution generated by the JPA's warehouses?
3. The week of January 9, 2023, I visited the JPA's offices to discuss my concerns and report idling semi-trucks. My concerns were addressed with the promise to speak with the tenants of the warehouses near my home and to conduct some noise level measurements. And you agreed to speak with the Riverside Sheriff's Department about ticketing idling or illegally parked semi-trucks. These promises are a step in the right direction but offer no accountability or proof they are occurring. Because the JPA's word hold very little value with me right now, I am not included to believe this engagement is genuine. How under the draft EIR for the Upper Plateau, and with the JPA sunsetting in 2025, would the public enforce clearly illegal activity and major disruptions to our lives today and in the future? The draft EIR offers no plan, nor have I experienced such accountability from the March JPA over the past five years.
4. On September 18, 2022, I emailed the March JPA and commission to ask for help with a pack of migratory coyotes who had taken up residence in my front yard and along the

I-788.24

fence of my back yard. These animals, like many others, are being pushed out of their territory by development and increased human activities within the JPA management lands. While I live in the City of Riverside, these animals don't but did visit and cause a problem related to safety for residents of the City. Again, the lack of accountability, changes to the climate and the coyotes' homes, and a lack of empathy for residents is the clear signal from the March JPA in your response.

I-788.24 Cont.

As I have demonstrated, it is misleading and disingenuous to say that the March JPA has authentically engaged with the public during this process. I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative development plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

I-788.25

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes (including mine) and that residents have submitted thousands of signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

I-788.26

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Also, how does this plan align with this goal and the subsequent 2003 and 2012 settlement agreements that require more of the same from the JPA?

I-788.27

I-788.28

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of

I-788.29

your plan? To date, the only comments we have been given is that a few members helped the developer reconsider siting of a road or placement of smaller industrial buildings deceptively identified as mixed use or business.

I-788.29 Cont.

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

> "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein; b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space; d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred."

I-788.30

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process. Why has the JPA kept the public in the

I-788.31

"Inform" and "Consult" stages of the EPA's decision-making continuum? And how do all of these examples constitute authentic public engagement?

Land Use Decisions: Privatizing Public Lands

It seems almost that as soon as the March ARB General Plan was released, the JPA and developer began to ignore it, began to upscope and maximize profits from this land, and began to ignore and disregard the public interest in the repurposing of this land. In the initial planning process, the March ARB Final Reuse Plan, 1996 describes how the community was included in the planning of land-uses.

"With the formulation of the Land Use Plan, the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v).

As part of the Base Realignment and Closing (BRAC) process four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B (shown below) is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered East of Brown Street within the first three quarters of a mile adjacent to the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. While the Business Park category allows warehouses, it also allows a wide range of other less intense land-uses identified in General Plan Table 1-1 below.

I-788.31
Cont.

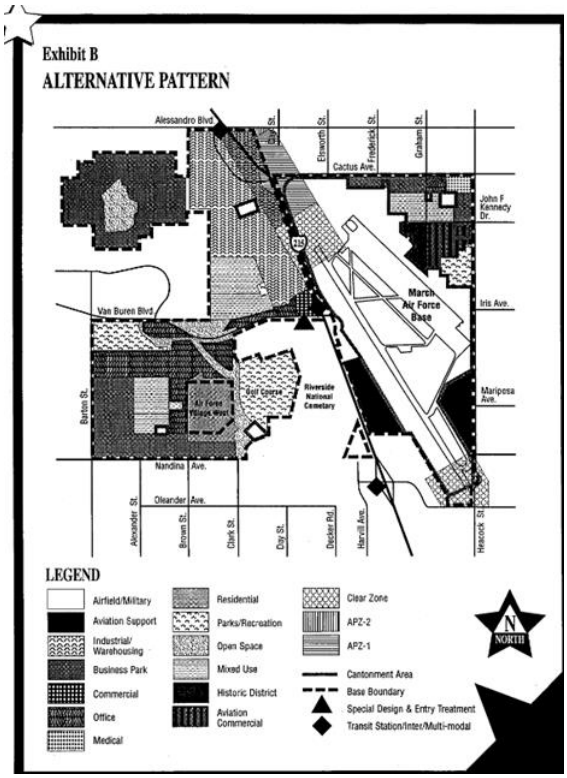


TABLE 1-1
BUILDOUT MARCH JPA PLANNING AREA

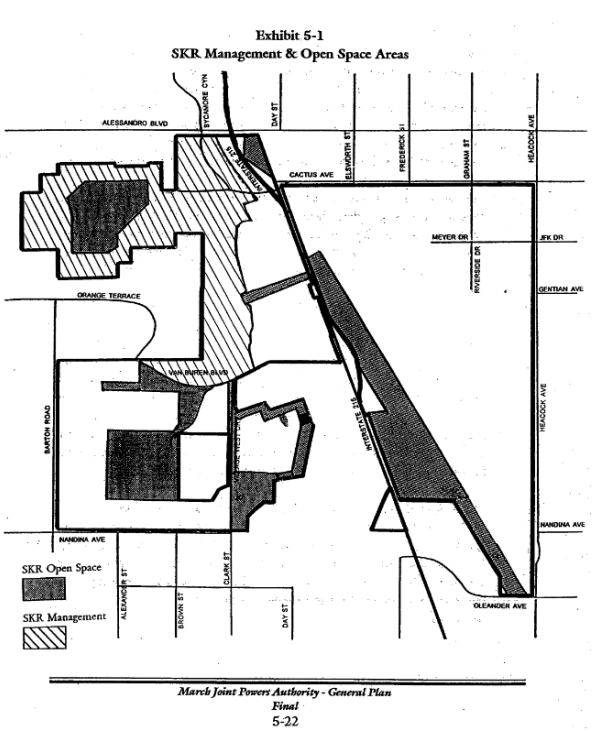
Land Use Designation	Acres GROSS	Density MAX.	Density AVG.	Buildout Capacity*
INDUSTRY				
Business Park	1278	.75	.20	7,793,755 sf
Industrial	433	.60	.15	1,980,455 sf
SUBTOTAL				9,774,210 sf
COMMERCE				
Office	104	.75	.30	951,350 sf
Mixed Use	360	.60	.25	2,744,280 sf
Commercial	45	.60	.30	411,642 sf
Destination Recreation	135	.50	.25	1,029,105 sf
SUBTOTAL				5,136,377 sf
PUBLIC				
Park/Recreation/ Open Space	777	.25	.025	592,307 sf
Public Facility	449	.50	.10	1,369,091 sf
SUBTOTAL				1,961,398 sf
SPECIAL				
Military Operations	2102	n/a	n/a	2,500,000 sf
Aviation	316	.40	.15	1,445,321 sf
Historic District	58	2du/ac	2du/ac	111 units
AFVW Expansion	75	.60	.30	686,070 sf
Cemetery Expansion	160	.10	.005	24,394 sf
SUBTOTAL				4,655,784 sf 111 units
TOTAL				21,527,769 sf 111 units

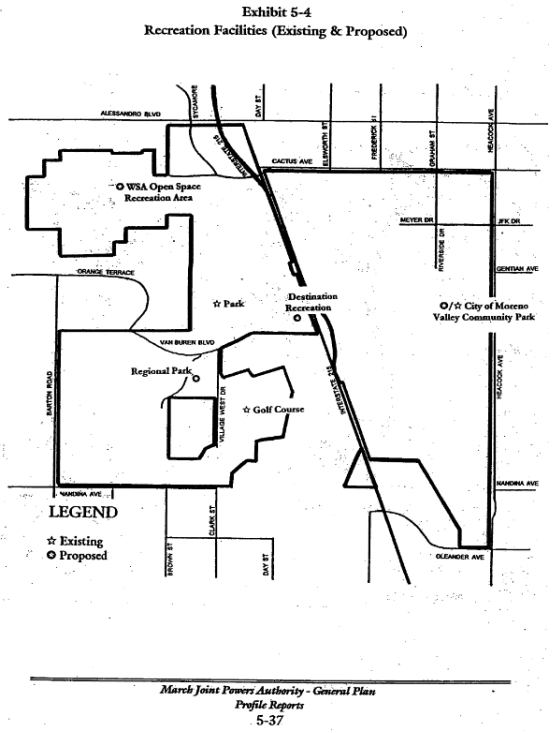
ac - acre sf - square feet du/ac - dwelling unit per acre
FAR - floor area ratio * based on average FAR, of net acre

I-788.31 Cont.

The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. This was the same map and designation I was presented with when I bought my house in 2009. In fact, I was given the maps in Exhibits 5-1 and 5-4 from the original owner and they clearly indicate the intention for this land was conservation. It was what the original owner, a municipal judge and retired Marine Corps officer, understood at the time he paid a premium to own a house next to this unique landscape and the military base that played such an important role in his life. Did the JPA change their minds after they wrote and disseminated the final General Plan? If so, why? What changed? Have the JPA modified the Final Land Use Plan in the past? If not, why are you proposing a specific plan that is inconsistent with the Final Land Use Plan (see your own diagrams and roadways)? Any specific plan needs to comply with the Final Land Use Plan and it is clear this one does not.

I-788.32





Moreover, the Draft General Plan 2010 "Draft Vision 2030" which incorporated clearly a desire to avoid incompatible warehouse land uses adjacent to residential homes. In Section 2.2.25(d) it stated, "Any and all future distribution/warehouse development in the Meridian West area shall maintain a 1000' distance from existing residential uses in accordance with the Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities. (See 2.1.4 of the Land Use Element)."

The historical precedent of the Final Reuse Plan (1996), General Plan (1999) and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses and all discussion of warehouse uses focused on appropriate setbacks to protect adjacent residential zoning.

I-788.32 Cont.

Finally, the specific plan for this campus changes the definition of the mixed-use land category. In the existing General Plan (1999), mixed-use is explicitly defined on page 1-34, "Mixed uses include a variety of complementary land uses; including commercial, business park, office, medical, educational and vocational, research and development, and services. Industrial and major warehousing uses are excluded."

However, in the draft EIR (2023), p. 2-4, mixed-use is now defined as, "Mixed uses include a variety of complementary land uses, including commercial, business park, office, medical, research and development, business enterprise, and services. Industrial, and outdoor storage is prohibited." Why change this designation? To approve unwanted warehouses on the Upper

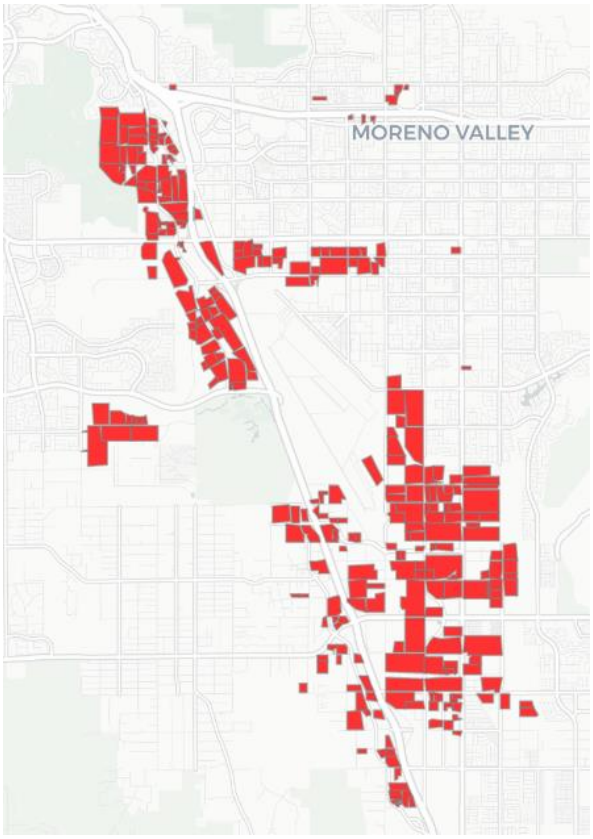
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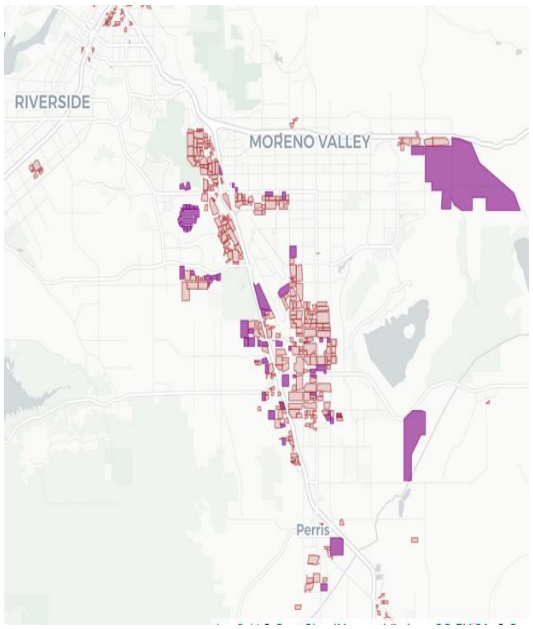
Plateau that was always set aside as a conservation and parks area? This makes no sense to the public and many who serve in local government of the surrounding jurisdictions.

Major warehousing uses are now acceptable to the March JPA in the mixed-use zoning, despite a 24-year precedent in its 1999 General Plan and the definition that excluded this use. This sudden change as deceptive and malevolent. It is misleading to the public, and it gives rise to the belief that the JPA, at the direction of the applicant, can do whatever it wants without consequence. The public expects better of the JPA and the Commission. What justification do you offer to explain this apparent privatization of public lands?

I-788.33 Cont.

The region of western Riverside County is overly populated with warehouses, largely because of the JPA's TFZ244. The residents of eastern Riverside, western Moreno Valley, north Perris, and unincorporated Riverside County all along the 60/215 freeway corridors are disproportionally impacted by these warehouses thanks to the JPA and the predatory nature of the developer.



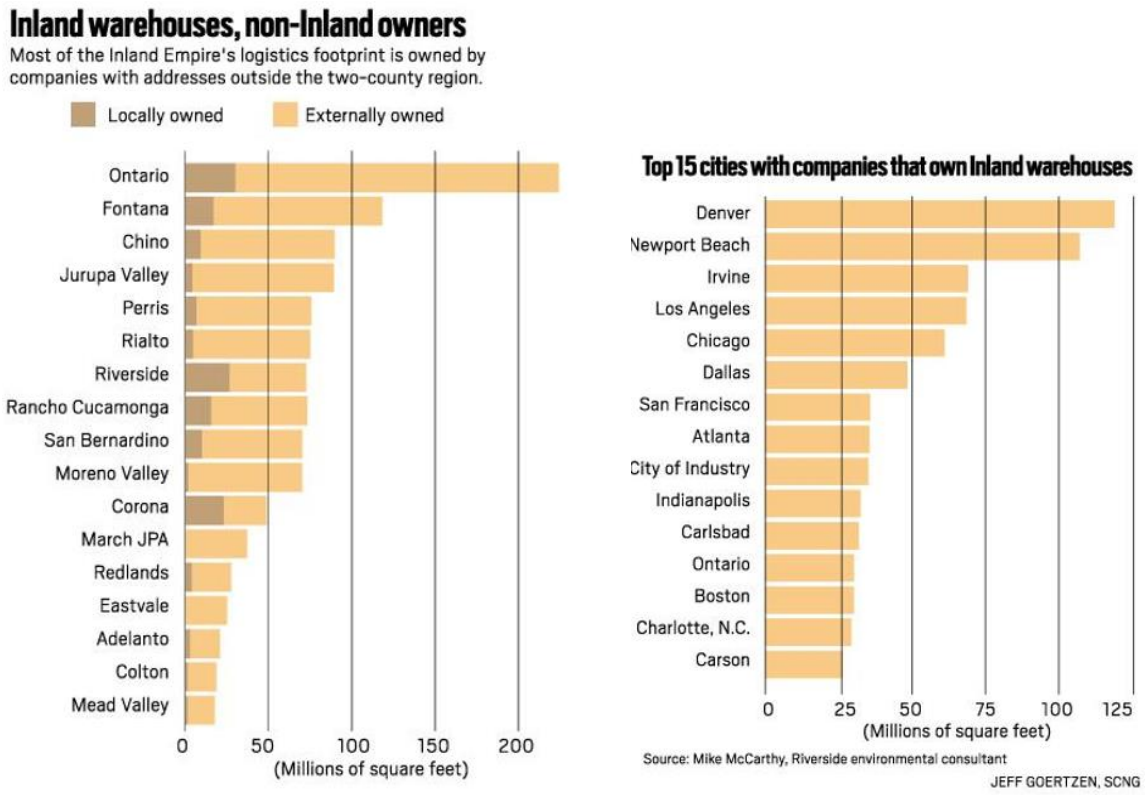


As the maps above demonstrate, the 215/60 freeway corridor is disproportionally impacted by the sprawl of warehouses and logistics. The JPA has specialized in placing warehouses on a majority of the land it was tasked with repurposing. So, one has to ask why build so many warehouses when they are not the land use planning option that the original General Plan and its

I-788.34

creators envisioned in the late 1990s. Well, it doesn't take long for a mistrusting public to draw rash conclusions like "it's all about the money" or "it is a land grab by the (insert your adversarial foreign government of choice here)."

Fortunately, a little work and publicly available information provides me with some insight to avoid the conspiracies about why there are so many warehouses in the JPA's territory. In a meeting with the JPA in April 2022, I was told that most of these warehouses are built as speculative developments, and that they don't have tenants waiting to lease or buy them. This is the case with the West Campus, Upper Plateau project as well. I was still new to this the development around March ARB in April, but I have had some time to learn about it since that meeting. The graphic below demonstrates the listed owners of the warehouses for warehouses in Riverside County, including the warehouses built by the JPA.



The nature of this speculative development means that the developer is incentivized to find financial backers, investors, that will fund the development of this land with the promise of a return on their investment. The way that the developer ensures that it and its investors profit is to spend the least amount of money in order to make the most amount of money in return. If the JPA or the developer had the public interest in mind, then why is it that the mailing addresses for the owners of these businesses do not have a more equitable spread favoring local owners? Is it because as the graphics indicate, and what I learned at the April 2022 meeting, that these

I-788.34 Cont.

warehouses were never intended to consider local business owners or local jobs for residents of western Riverside County? Is it because these warehouses are part of an investment portfolio for companies more concerned with Wall Street than the local streets of Alessandro or Van Buren? Is this another example of the JPA allowing their exclusive private developer to profit off lands that were intended for public benefit?

If I were to dig further, would these addresses stop in Denver, Tulsa, Chicago, Atlanta, or Newport Beach? Or would they quickly leave the North American shores and head to destinations far and wide? Are you, the JPA, telling me that my desire to live a happy and healthy life is not as significant as the portfolio of the investors of your exclusive developer and their wealthy corporate friends? It is at times like this that you have to decide where your obligations lie. Do they lie with those that will profit from bad decisions or do they lie with the people you were hired and tasked to serve? How will you enforce the JPA's own mission identified in the General Plan, the one that protects community values, health, and history from narrowly focused and neglectful land use decisions? I cannot see how building more warehouses accomplish this clear and focused goal as described by the writers of the original General Plan document. Where again is the accountability to the public? What will it take to get the JPA to stop privatizing public lands? Fortunately, I have some recommendations for you.

I-788.34 Cont.

Alternate Plans: Non-Industrial Options

This brings me to a crucial and consequential point in this comment letter and the heart of my objection to this project, a project that would build nearly 5 million square feet of industrial warehouses right in the middle of a large residential neighborhood. Ever since the community became aware of and engaged in the plans for this shocking large industrial project, the community has repeatedly asked the JPA for one thing: **no more warehouses**. Warehouses are a part of life today, Chair Conder is right about that, but it is egregious to consider putting so many of them right in the middle of thousands of homes, something Chair Conder, the JPA, and the developer fail to acknowledge. This specific plan is a bad idea and real alternatives are needed.

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But before we get to the alternative plans, on page 860/916 of the draft EIR, the JPA and developer address alternatives to the project that were rejected. The first reason listed (6.3.1) is that there is no alternate site for this project (because of its size). This explanation implies that this project (a mega-warehouse complex) is pre-decisional, the realization of a legal entitlement for the developer to build warehouses anywhere it wishes. It implies that because the developer wants mega-warehouses to lease or sell to whomever (foreign or domestic) it wants that it is their right to repurpose public land for private gain. It implies that the decision to build only warehouses here was made long ago and by approving their plans the JPA and this commission are helping to privatize public lands in a way that damages the public interest and our infrastructure but benefits the developer financially. There is absolutely no community sentiment for building warehouses here (nor is there a need for the few temporary, low paying jobs created by these eyesores), but there is wide ranging public support for development that improves our

I-788.36

lives and community. The developer does not prioritize the values of the community, the protection of its citizens, or the collaboration with communities impacted by this project. They have a history of sanctioned negligence and their lack of accountability and accuracy is even written in the draft EIR. Residents of Riverside, Moreno Valley, Perris and unincorporated Riverside County expect the JPA to hold the developer accountable for our lives as much as it allows them to profit from this project. What lengths have you taken to do this? How will you hold them accountable on our behalf? How will you enforce your own mission identified in the General Plan, the one that protects community values, health, and history from narrowly focused and neglectful land use decisions? The economic risk here is massive; as quickly as the economy moved to demand more storage space, it will in all likelihood swing back and once built that space will sit as an empty concrete monument to bad government decisions and capitalism at its worst.

I-788.36 Cont.

Now on to the alternate plans: Section 1-10 of the draft EIR presents four alternative plans evaluated for the release of this document. If the JPA and developer had truly listened to the public when you met with us, if you had genuinely engaged with residents of Riverside who are directly and adversely impacted by this plan, then maybe one of your four alternative plans would have included development without warehouses as thousands in the community have asked for the last 12 months. At the risk of being repetitive, why have you ignored this request? The public expects the JPA to honor its commitment (page "v" of the General Plan) to serve as a link between community values and physical (land use) decisions. Is this line guidance or a mission statement? After 11 months of communication with the JPA, why is there no option to develop this land in a way that reflects community values and input?

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In the draft EIR, Alternate Plan 1 under consideration is titled "No Project" and under section 6.4.2 the explanation of this plan appears to be a mandated option in the EIR, primarily for comparison purposes with the main plan and the other three alternate plans. This plan can be easily dismissed as naïve and misguided, and more than once I have been accused of being the loudest of the unreasonable proponents of this alternative. Alternate plan 1 is ideal and is the right decision for this land from a residential land use and quality of life point of view. Think about it, this land has historical significance for Riverside, Moreno Valley, and Perris communities that grew up largely because of March AFB and these weapons storage facilities. The historical and native artifacts found in the area are irreplaceable and according to Table 1-3 this project will cause significant and unavoidable damage to these American and Native American symbols of our past. The notion that any paleontological monitor or program (page 1-53) would have the authority to protect of slow demolition or construction of these warehouses is not a genuine offer or mitigation for unearthing items from our history, some of which may have been placed in their resting spots intentionally and with purpose or meaning. I do not believe the JPA or the builder will do the mitigation described in your draft EIR and want to understand why (a) I should take your word in writing for it (legal action is not a suitable response), and (b) why the JPA erase the history and public image of March Air Force Base?

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Conversely, Alternative plans 2-4 all include significant warehouse development, major and heavy demolition and construction to build these warehouses, and will still have significant (maybe not according to your legal terms in table 1-3) impact on surrounding residents health and quality of life. These alternate plans demonstrate that the JPA held public meetings as a matter of process and did not genuinely intend to work with the community (as indicated in your own general plan) to repurpose this land and positively build up (literally and metaphorically) the surrounding communities. Also, within these three alternate options, for you to tell the people that live here that the proposed plan and three of the alternative plans WILL HAVE significant and unavoidable impacts on our lives is reprehensible, especially for an agency who says they are committed to protecting (at your discretion apparently) our lives.

We have asked you in person, in writing, on the phone, virtually, and in every way we could to offer development plans that think forward, that offer jobs to our kids and to the bright engineering students and scientists graduating from UC Riverside and other area colleges, jobs and land use that grow our community with essential services, conserving resources like water and electricity (even generating and storing that electricity), providing a place for the community to gather without congested roads and polluted landscapes: **no more warehouses**. You ignored the community and you did so it seems intentionally. Was this at the direction of your commissioners? Was it at the direction of your exclusive developer? Did the Air Force tell you it wanted more warehouses? Did you read some online reports as I did about the economy? Or are you like an addict reaching for the quickest and most immediately gratifying type of development project available today? Maybe this letter can be your intervention. Maybe you just need help kicking the habit you have so clearly demonstrated over the past five years and finally consider the people that live and make up the municipalities you claim to represent.

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To that point, when it became clear to me that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial and logistics, I began working with concerned members of government, business, and a diverse and engaged members of the community to develop three reasonable alternatives to your plan for the Upper Plateau. Having been rejected by the JPA, the developer, and Commission members in the past by proposing everything from a solar farm and energy storage facility to a winery (the bunkers would make great tasting rooms providing they are not radioactive) to mixed use residential and commercial centers, all reasonable ideas seemed to fall on predetermined ears. Thus, it seems like the right time to describe alternate projects with considerable appeal to the community and with traits of realistic development opportunities for the JPA and the applicant as I express my strong objection to the specific plan and alternate plans proposed in the draft EIR.

I-788.40





1. Alternate plan #1: The Campus Approach
   - *Concept*: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
   - *Environmental Analysis*: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
   - *Project Objectives*: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus not would not be connected under this plan).
   - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open-space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and a unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
   - *Concept*: A veteran's village that incorporates open-space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

I-788.40 Cont.

- *Environmental Analysis*: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
- *Project Objectives*: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
- *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open-space. This is a patriotic plan that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach
   - *Concept*: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
   - *Environmental Analysis*: These public parks help revitalize communities impacted by the closure of the military bases, providing close to home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
   - *Project Objectives*: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
   - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offer residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses. And it is easily the most popular alternate plan offered here. The public is aware of and has asked for this plan as their clear first choice.

I-788.40 Cont.

My preference is clear and I have indeed spoken with the National Parks Service about making alternate plan #3 a reality. There is funding available to do this and all agencies (JPA and the four member agencies) would profit from the establishment of such a park. The JPA could engage with the National Parks Service, for example, and initiate a BRAC agreement to purchase this incredibly unique land and preserve the entire property for the very reasons identified in the 2012 Center for Biological Diversity agreement which seeks to preserve a delicate desert riparian ecosystem, preserve historic and cultural artifacts (hidden well within your draft EIR so much so that I have yet to discover them), and protect (without discretion) threatened or endangered species like the Stephen's Kangaroo Rat and the burrowing owls located at the northern end of the property. Such an agreement would pay the JPA member agencies and immensely benefit the surrounding community by giving them recreation opportunities and serving as a buffer from the dreaded industrial sprawl that you are advancing without restraint. This solution is feasible, positive from all points of view, and something you have control over. It would serve as a compromise for all involved and would not negatively impact the airport/USAF.

Should the JPA consider any of these plans as viable solutions, I am happy to serve as a member of a community advisory board that will help facilitate, discuss, and explore how any of these plans could materialize. I am happy to also help advocate for and work to make any of these plans a reality for the JPA and my surrounding neighbors. And while the business minded persona deep inside of me would like to profit from such involvement and work, I would convince that part of me that an alternate solution to more industrial warehouses is more than enough reward for my time and hard work.

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Baseline Information: Misleading and Inaccurate Data Used in Project Plan

I am not sure how any of this is legal; it is difficult to imagine how the draft EIR complies with CEQA and common sense (maybe the two are incompatible) without considering the cumulative impact the specific plan would have on the region. The draft EIR fails to consider the cumulative impacts the specific plan would have on traffic, air, light and noise pollution, housing, and use of resources and infrastructure like water, gas, and electricity and roadways and law enforcement regionally. In many cases, the draft EIR makes use of multiple datasets to form its findings and justification for moving forward with this project. In some cases, this data is a preference of the JPA and the developer because it helps you make your point or it justifies your vision for the project. But in other cases you have mistakenly or purposefully used multiple, dated, or inaccurate studies and data in the EIR and the inconsistencies raised by old or incompatible data and reports is misleading to the public.

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To begin, in all of the presentations and reports I have seen published by the JPA related to this project, **jobs** has been the primary justification for building industrial on the Upper Plateau. It has been an ever-present and leading comment by Dr. Martin and the developer in public meetings or briefings: this project will provide jobs for local residents. But there are many, many

I-788.42

problems with this argument, again your primary argument for building industrial warehouses on the West Campus Upper Plateau. This justification just doesn't hold up to further scrutiny.

Publicly available data from city, county, and federal jobs reports indicate that there are not enough unemployed people in the local area to fill the number of jobs that the logistics industry claims they are creating. Let's look at the population in western Riverside County for example; there are approximately 630,000 residents (approximately Riverside 318,000, Moreno Valley, 212,000, Perris 80,000, and Mead Valley 20,000). Based on the most recent employment statistics for the area, it is safe to estimate approximately 300,000 employed working-age people and 11,000 unemployed (based on the 3.5% unemployment rate). Even adding in residents from unincorporated areas like Woodcrest, Nuevo, and Sun City, there is nowhere near enough capacity for the jobs the industrial sector is claiming. The World Logistics Center in Moreno Valley is supposed to generate 35,000 jobs. Stoneridge Commerce Center is will generate 10,000 or more jobs. There's no way this region can add 45,000 jobs in just warehouses locally. Even if everyone who turned 18 decided to work in warehouses for 10 straight years, the data just doesn't add up. And with college enrollment beginning to rise again after COVID, it is unreasonable to believe that there will be enough local residents who will be willing to work for low paying wages and still be able to afford the cost of living in western Riverside County.

I-788.42 Cont.

I'd like you to explain to me how graduates of local colleges like UC Riverside, Cal Baptist University, California State University San Bernardino, University of Redlands, and the community colleges in Riverside, San Bernardino, San Jacinto, Moreno Valley, and Yucaipa will find employment in the industrial sector and at these warehouses? If this area is to keep growing, it will require high paying jobs in the medical, technology, and energy sectors in order to keep the next generation of educated citizens an income that allows them to live in western Riverside County. Please explain in detail how this plan helps employ college educated workers. And if there is no explanation, please revise your jobs argument and projections for this plan or propose an alternate plan that meets the goals identified above in this letter.

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You see, the majority of warehouse jobs are low-wage and temporary work with reduced hours, and workers cannot afford to live in the local area. Per Indeed.com, the average annual salary of a warehouse associate in Riverside, CA is $35,160. Even if one assumes that a resident is fortunate enough to find a warehouse job that provides 40 hours a week for 12 months out of the year, a rare find in this industry where workers average is less than 30 hours a week right now, a person could not afford to live in the local area. Rather than living close to where these warehouse workers live, as indicated in the draft EIR in multiple locations, warehouse workers at the Upper Plateau would have a considerable commute to earn their low wages. In fact, according to rentdata.org, the fair market rent for a 1-bedroom apartment in the 92508-zip code is $1398/per month. As of January 2023, the median home price for the zip code 92508 is $667,500. Even if a warehouse associate were to find a rare steady, full-time job, they would have to pay an unsustainable amount of their paycheck to rent alone. These jobs you insist are the primary reason for building only industrial on the Upper Plateau simply cannot support the

I-788.44

lives of people who live within a 30-40 mile radius of these buildings. These jobs cannot and will not serve the local residents. They will increase traffic on the 215, 60, and 91 freeways and local arterial roads, and they will not return the economic boon that you are projecting in your justification for more industrial buildings on the Upper Plateau. Your findings on the impact on housing for the project is faulty, inaccurate, and misleading to the public. This project needs a more detailed and realistic study on housing for these low paying warehouse jobs and low-income warehouse employees. Why did you not provide it with the draft EIR?

I-788.44 Cont.

In fact, the logistics industry has actually weakened the economic outlook of our region overall. According to the SCAG December 2022 economic outlook report, "In 2001, GDP per capita in Riverside County and San Bernardino County were 64 percent and 69 percent of U.S. per capita GDP, respectively. When compared to the Rest of California, the ratios are worse: 52 percent and 56 percent. Moreover, by 2022, Riverside County's position had deteriorated to a per capita GDP of only 59 percent of the U.S. level and 40 percent of California. San Bernardino County was at least able to improve to 71 percent of the U.S. level, but still fell to 48 percent of the rest of California level. These numbers are alarming, especially given the success of the Logistics Industry. They imply that the impressive job growth in the Inland Empire since 2001 resulted in numerous jobs, but they tend to be relatively lower paying jobs compared to other parts of the state and nation. This explains, in part, why such a large number of workers prefer to commute into the coastal areas, despite the heavy cost involved in terms of time lost on the road. It also explains why the Inland Empire's per capita GDP has sunk to a rank of 340 out of 386 MSAs, despite being the twelfth largest by population count." More than anything, the draft EIR lacks a detailed analysis of why the JPA insists on contributing to the economic downfall of its member organizations. Why do the cities of Riverside, Moreno Valley, and Perris want to support low-income jobs and residents? What social infrastructure exists for employees who do not have access to affordable healthcare because they only work on a part-time basis? Why has the JPA not included this as a consideration of impacts for the surrounding communities? Any approval of the plan as presented simply ignores the needs of disadvantaged communities and seems to ignore the facts of what really is happening in the current warehouses located within the JPA's territory today.

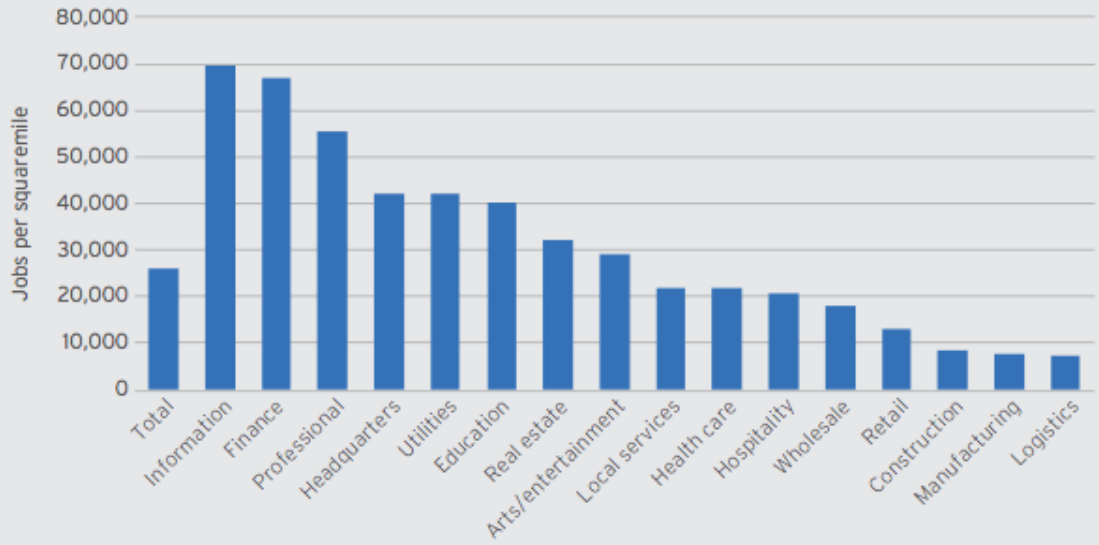
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The continued insistence for only industrial and logistics jobs and buildings in western Riverside County is a slide backwards economically and socially. Some may argue it is a form of social and economic injustice. By forcing a specific industry or employer on people who live in an area, you are forcing young people to decide to live in the community they grew up in, near family and friends they love and value, and work in jobs that disregard their quality of life, negatively affect their health and mental wellbeing, and limit their potential income levels, or move out of the region to find better quality of life and employment opportunities. Most valid and widely accepted studies show that industrial is the worst land use possible when it comes to job generation. Warehouses provide 0.000212 jobs per square foot and are the lowest economic jobs density of any professional category. It is literally the worst job creator per unit of land there is. The table provided below is from 2015, but the data has only gotten worse for the logistics and

industrial warehouse sectors. The advances in technology and efficiencies gained through automation have only reduced the number of warehouse workers inside of buildings today.

Figure 10. Jobs in advanced services sectors are located in the densest parts of metro areas on average

Job density by sector in 2015



Note: Agriculture and mining are not shown due to their small number of jobs but count toward the total.
Source: Brookings analysis of Census LEHD Origin-Destination Employment Statistics

I-788.45 Cont.

Advances in automation may lead to mass unemployment if we overinvest in this industry. According to the December 2022 SCAG report quoted above, "Over the long-run, Logistics will likely go through a transformation as advances in automation and artificial intelligence displace workers. This means that the industry may continue to thrive, but it may not support the same number of workers as it presently does. In turn, the region must look to other industries as sources of employment and output growth. There will be further costs from the expansion of the Logistics Sector if the result of the expansion means that there will be less industrial space available in the future for industries which are able to add more value to the economy per square foot." What evidence have you provided in the draft EIR that refutes this report? What evidence does it provide to tout the benefits by way of high paying jobs related to the coming of advanced automation and technology in the logistic sector? What mitigations do you have in place to deal with the loss of the very few jobs that you say this project will create? What mitigations do you offer the public in the event of a down or changed economy that no longer values or utilizes e-commerce as we do today? There are few easy answers here and it is likely that the JPA is gambling that these buildings can be completed before people abandon the e-commerce trends that rose so swiftly during the monumental changes in life due to COVID-19.

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For these reasons related to jobs, I urge the March JPA to think harder before making the jobs argument for the West Campus Upper Plateau. We do not need, nor can we support, 2,600 more warehouse jobs in this region. We are already oversaturated with the logistics industry and need to think more creatively about land uses so that it benefits the local region and doesn't simply line the pockets of developers.

I-788.47

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

I-788.48

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

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

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the

"ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

I-788.48 Cont.

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

I-788.49

Lastly, the draft EIR concedes that there will be "significant and unavoidable" **air quality** impacts on surrounding residents. However, I believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts in order to mislead the public of the cumulative severity the impact of poor air quality will have the health of the residents of western Riverside County.

I-788.50

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project and thus the draft EIR is incomplete, inaccurate, and provides the public with erroneous information to consider related to the specific project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others are being planned or built right now. They will drastically increase airborne pollutants and significantly worsen the air quality in western Riverside County. If you insist on continuing with this harmful project, please include the cumulative impacts in both the local and regional analysis for the final EIR.

I-788.51

The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. I again ask how this project helps California push for net zero emissions moving forward?

I-788.52

You have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including

I-788.53

installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the JPA and developer should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the draft EIR for this site? Will you require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)? Will you insist that the developer avoids blasting during demolition? The disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing, especially considering the potential toxic nature of parts of the munitions bunkers you will be removing.

I-788.53 Cont.

I ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I-788.54

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected? Will you help establish a Community Advisory Board to the JPA with the authority to work along side the TAC and Commission?

I-788.55

Publicly, the JPA points to language in the General Plan and the March JPA website that states the primary justification for this sprawling industrial project is their duty to develop and repurpose March ARB lands and to bring jobs to the area. Yet the JPA has documented that it has already replaced the jobs lost by the realignment of the base in 1993, Dr. Martin proudly stated this in front of the Riverside City Council in October. The draft EIR references in many places that 2,600 jobs would be created at the peak of operations resulting from this project, but later this document admits that the jobs would not result in long-term employment growth for the region (section 4.7.32), and public data suggest that this number is also inaccurate. The unemployment rate in this region of Riverside County is between 3.3-3.7% and the and the average household income is $103,513. There is no need for a giant concrete logistics center that will not impact the jobs numbers for this area, nor would those jobs pay the kind of wage that would allow people to live in this area.

The EIR contains some mixed messaging (at best) on jobs for sure, but the end result is this is not an overwhelming driving reason to build warehouses on the Upper Plateau. This argument by the JPA and developer is misleading and is not supported by data on your local agency websites. Please explain how the low quality and temporary jobs this project would provide will employ residents (as stated multiple times by the draft EIR). Western Riverside County cries out for jobs

I-788.56

that can support the cost of living in this region and warehouse jobs cannot do this. How is this a primary reason to approve this project? If job creation is a primary driving factor for this project, why hasn't the developer and the JPA created a land use plan that focuses on jobs for residents of western Riverside County? There must be a better use for this special piece of land, one that the Air Force, residents and visitors, local municipalities, lawyers and lawmakers, and the JPA and the applicant can all support. Are you ready to do your part?

I-788.56 Cont.

Conclusion: an unpaved path forward

As a concerned citizen, it is not enough to just find problems with the draft EIR and the process undertaken by its developers. Responsible citizens take an interest in their community for the benefit of all people and businesses, working to avoid the economic and social injustices these warehouse projects present our communities. With this in mind, I have the following mitigations and solutions to request of you related to the West Campus Upper Plateau project, the draft EIR, and the March JPA's operations moving forward.

First, commission a community advisory board that works alongside of the JPA and the developer working collaboratively to develop a list of alternative plans that would support the goals of the JPA and meet the needs of the community while allowing the developer to realize a profit and an incentive to do the work. This advisory board would need to have some level of authority, a voice in how this land is used and in the enforcement of policies that protect the neighbors surrounding it. Genuine public engagement is recommended by the March JPA General Plan (p.1-3, 1st paragraph; p.1-5, 1st paragraph; p.1-13, goal 2; p.1-14, goal 4; p.1-18, goal 8; and p.1-37, all) and the Final Reuse Plan (p.I-2, last paragraph; and p.II-10, item F) and a community advisory board is one way for you to align with these recommendations and work harmoniously with business, developers, public government, and the people whose taxes pay for all of this. It is also a tool your organization has successfully used in the past and it seems like an essential step to take in order to maintain the close public connection March AFB has always enjoyed in this area.

I-788.57

Second, the public and local jurisdictions would support the JPA if it represents the interests of the people who live in these communities and the USAF instead of representing the interest of the entitled developer and its Wall Street investors. Be our leader and advocate for one of the researched and vetted alternate plans recommended in this letter. Thousands of voices of the residents of western Riverside County have spoken clearly over the last year. The people who have invested in and helped pay for the land that March AFB was built on demand a voice and a return on their investment. There is a time to rise above the legal loopholes that allow private companies to derive profit from public lands. Local businesses would appreciate a voice in this effort as they would benefit and offer jobs at a much more significant level than a million square foot warehouse ever would. Residents would enjoy natural landscapes with open space and unimproved trails that allow them some relief from the urban world around them. The land itself would appreciate it too. And the JPA gets to satisfy its mission and realize its economic goals by

redeveloping the land and bringing jobs that would actually employ the people who live near March ARB. Once again, we'd have a community living in harmony and with purpose (the roots of the March AFB community) instead of one literally divided by an investment or development portfolio for global investors.

Lastly, while the March General Reuse Plan was written more than 20 years ago, and you have publicly stated that it is a guideline rather than a requirement for the JPA to follow it, you owe it to the public the plan was created to protect and benefit to develop this land primarily in our interest, not in the interest of outside investors. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. The general plan was the government's best effort to do something positive for Riverside, Moreno Valley, and Perris residents who directly felt the blow of decommissioning the March base. Ask anyone that does not work for you, has the JPA lessened that life altering change from the 90s today? Has the JPA improved people's (not you or your exclusive developer partner) lives?

The March JPA and its exclusive developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. You have a duty to think about this land after your organization sunsets in 2025. Your overreliance on heavy industrial development will leave the communities surrounding March ARB with more problems than they will be able to handle 10 years from now. I have found nothing in the draft EIR to convince me that you have planned for this area beyond the conclusion of its construction. This, it must be stated, is irresponsible land use planning and land management. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations developed, limiting the negative impacts developing this land will have on the residents who will have to live with this development. Please don't allow one final grand act of greed and poor land use planning be your lasting legacy. I await your detailed response. See you down the road.

"There is a wisdom that is woe; but there is a woe that is madness."

Jerry Shearer
Riverside, CA 92508
jsydor@yahoo.com

I-788.57
Cont.

Letter I-788

Jerry Shearer
March 9, 2023

I-788.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-788.2 This comment summarizes the Project location and the documents reviewed by the commenter. The comment also raises general concerns regarding the Draft EIR. Please see Topical Response 4 – Project Consistency, of this Final EIR, for a discussion of the Project's consistency with the referenced settlement agreements. With regard to community engagement, March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. The comment also refers to public lands. The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant. With regard to the request for a non-industrial alternative, please see Topical Response 8 – Alternatives, which includes a no-warehouse alternative. The comment also refers generally to baseline information used to develop the plan but does not identify specific issues with respect to the environmental analysis.

I-788.3 The comment raises general concerns related to climate change and aesthetics. The Draft EIR addresses climate change in Section 4.7, Greenhouse Gas Emissions, and aesthetics in Section 4.1, Aesthetics. See also Topical Response 1 – Aesthetics. With regard to zero emissions standards, MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the Project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the Project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed. In addition, as discussed in the EIR, with implementation of MM-GHG-1 through MM-GHG-12, the Project will be consistent with the applicable GHG reduction plans and GHG impacts would be less than significant. The Project will not impede the State's progress to carbon neutrality by 2045. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Please see Recirculated Section 4.2, Air Quality, for a detailed discussion and list of the mitigation measures being added to the Project.

I-788.4 This comment questions the Project's consistency with the CBD Settlement Agreement (Appendix S). The Project complies with Exhibit A of the CBD Settlement Agreement, which outlines precisely which areas would be placed into conservation and which would be developed. As such, the Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat

value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. In response to this comment, please see Topical Response 4 – Project Consistency, where the Project's consistency with the CBD Settlement Agreement is discussed.

The Project adheres to the conditions laid out in the CBD Settlement Agreement which was approved by the wildlife agencies. Two wildlife crossings are planned under the extension of Cactus Avenue and one wildlife crossing is planned under the Brown Street extension. The crossings will consist of soft-bottomed culverts approximately 6 feet in height by 20 feet in width to allow for adequate passage of animals north to south under Cactus Avenue and east to west under Brown Street. These specifications follow the CBD Settlement Agreement, which prescribed design standards suitable to accommodate local land locomotive species.

I-788.5 This comment expresses concern about the shrinking of open spaces and destruction of habitat. Comment bullets 1 through 4 are similar to Comments FL-C.4 through FL-C.7 of Form Letter C – Biological Resources. In response, please see Form Letter C Response. Regarding comment bullet 5 questioning the Draft EIR's evaluation of reptiles, as explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), habitat assessments were performed for all special-status species, including reptiles, in compliance with CEQA requirements (please see section 3.4.2 of the Biological Resources Report [Appendix D-1]). Evaluations of the communities on the Project site were not intended to be exhaustive, but to provide sufficient information for decision makers to understand the environmental consequences of the proposed Project. With impacts on native vegetation communities present on the Project site, it is assumed that species inhabiting those communities would also be impacted, including reptiles. Impacts on these native upland vegetation communities and the species they support would be mitigated through purchase of credits at an approved mitigation bank.

Regarding comment bullet 6 questioning the Draft EIR's evaluation of migratory birds, as explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), all special-status avian species, both resident and migratory, were assessed for their potential to occur on the proposed project site. Potential impacts on any special-status species with moderate or high potential to were evaluated in this analysis. These include Bell's sparrow, burrowing owl, California gull, California horned lark, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, Southern California rufous-crowned sparrow, yellow warbler, and yellow-breasted chat. Impacts were assessed for all special-status migratory bird species, whether they have potential to occur while overwintering or during the nesting season (i.e., burrowing owl, California gull, sharp-shinned hawk, yellow warbler, and yellow breasted chat). The Project Biological Technical Report (Appendix D-1) discloses the potential presence of many non-special-status migratory bird species and that habitat-based impacts on these species would occur with Project implementation. Impacts on native habitats and the species they support, including migratory bird species, would be mitigated through purchase of credits at an approved mitigation bank. In addition, impacts on nesting birds would be less than significant with the

implementation of MM-BIO-7 and impacts on adjacent habitat that supports avian species would be less than significant with the implementation of MM-BIO-1.

Regarding comment bullet 7 questioning the Draft EIR's evaluation of insects, as explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), habitat assessments were performed for all special-status species with potential for occurrence in the region in compliance with CEQA requirements. No special-status insects are known from the Project vicinity, and none have a moderate or high potential for occurrence on-site. As discussed above, evaluation of the communities on the Project site were not intended to be exhaustive, but to provide sufficient information for decision makers to understand the environmental consequences of the proposed Project. With impacts on native vegetation communities present on the Project site, it is assumed that species inhabiting those communities would also be impacted, including insects. Impacts on these native upland vegetation communities and the species they support would be mitigated through purchase of habitat credits at an approved mitigation bank. Regarding disturbance of insect populations, such as ants and mosquitos, during Project construction, the Conservation Easement will remain undisturbed and available to provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.

The comment raises concerns regarding the validity of the biological surveys conducted for the Project. As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2) and discussed above, the studies presented in the Project Biological Technical Report are not intended to be exhaustive of all life forms that occur or have occurred on the proposed Project site. CEQA does not require the lead agency to perform all research. The Project Biological Technical Report (Appendix D-1) provides decision makers with information which enables them to make a decision which intelligently considers potential environmental consequences of the proposed Project. The Draft EIR and Project Biological Technical Report (Appendix D-1) provides information from a snapshot in time and may not be exhaustive of all common (non-listed) species that may occur; however, all habitats were assessed and all special-status species with potential for occurrence were addressed in the analysis.

The CBD Settlement Agreement (Appendix S) presents the decisions agreed upon by the Center for Biological Diversity and San Bernardino Valley Audubon Society, organizations that are staffed by experts in the field of environmental law and conservation biology, and March JPA and LNR Riverside LLC. The conclusions drawn in the Settlement Agreement were based on adequate consideration of all impacts resulting from realignment of the previous March Air Force Base and proper valuation of the land regarding biological resources. See Topical Response 4 – Project Consistency, for further discussion of the CBD Settlement Agreement.

I-788.6 The comment references a term of the CBD Settlement Agreement regarding the use of existing service roads by the public for passive recreation and expresses concern about the public's continued ability to access the trails. The Project consists of two components: the Specific Plan Area and the Conservation Easement. The approximately 370-acre Specific Plan Area includes the remnants of the March AFB Weapons Storage Area which has consistently been fenced off to prevent public access. The remainder of the Project site will be preserved in the approximately 445-acre Conservation Easement, which includes the trails the public has accessed for passive recreation purposes. The public's utilization of this area for passive recreation is subject to the discretion and authorization of March JPA, as noted in Chapter 4.0, Environmental Analysis, of the Draft EIR. As detailed throughout the Draft EIR, there is no development proposed within the Conservation Easement and no physical

alteration is anticipated. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. Please see Topical Response 4 – Project Consistency, where the Project's consistency with the CBD Settlement Agreement is discussed.

I-788.7 This comment questions what has been done to establish and fund the endowment. The comment requests dates on which the endowment was established, payment dates and amounts, corresponding permit dates, and progress toward the $2 million funding level projected for April 1, 2027. The endowment was created in late 2012, and the current endowment balance is $1,095,182, as of January 2024.

I-788.8 The comment refers to a Base Realignment and Closure Act (BRAC) park alternative plan suggested by the comment. Please see Topical Response 8 – Alternatives, for discussion of the suggested alternative.

I-788.9 This comment questions what will happen in June 2025 when March JPA's land use authority reverts to the County of Riverside. In response to this comment, please see Topical Response 9 – Long Term Project Implementation and Enforcement.

I-788.10 This comment questions the Project's consistency with the 2003 Settlement Agreement. In response to this comment, please see Topical Response 4 – Project Consistency, where the Project's applicability to the 2003 Settlement Agreement is discussed.

I-788.11 This comment is similar to Comment FL-G.4 of Form Letter G – Traffic. In response to this comment, please see Form Letter G Response

Additionally, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway. With regard to the 2003 Settlement Agreement, please see Topical Response 4 – Project Consistency.

I-788.12 The comment questions why cumulative impacts for traffic were not considered within a five-mile radius of the Project. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), the Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. The March JPA Traffic Impact Study Guidelines utilizes a 5-mile radius around the Project site for determination of approved and pending projects for cumulative analysis. This is consistent with traffic study guidelines for WRCOG, County of Riverside, and the cities of Riverside and Moreno Valley. The 5-mile radius is intended to capture all of the regional intersections where the Project would contribute 50 or more peak hour trips. This also captures the areas where the

Project would have more concentrated air quality and GHG impacts. Please see Topical Response 7 – Cumulative Projects, of this Final EIR for further information.

I-788.13 This comment expresses concerns about traffic on arterial streets, trucks not following the enforcement codes, and questions what enforcement mechanisms will be used to mitigate traffic. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Under PDF-TRA-1, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. The comment also references prior comments regarding the I-215 and 215/60 corridor, and other projects and truck routes in the area. Please refer to Response I-788.11 above for detailed discussion. With regard to the 2003 Settlement Agreement, please see Topical Response 4 – Project Consistency.

I-788.14 The comment suggests that noise associated with idling semi-trucks has not been accounted for. As explained in the Urban Crossroads Noise Responses to Comments (Appendix M-2), in Section 4.11, Noise, of the Draft EIR, and in Section 9.2.2 of the Project Noise Study (Appendix M-1), the Project's noise analysis specifically includes truck idling. As the Draft EIR explains, the noise analysis used the reference noise levels to represent the Specific Plan operations and calculate the operational source noise levels, including loading dock activity and truck movements, that are expected to be generated at the Specific Plan area and the Specific Plan-related noise level increases that would be experienced at the sensitive receiver locations.

As explained in the Draft EIR, the reference loading dock activities are intended to describe the typical outdoor operational noise activities associated with the Specific Plan, and noise source levels from the loading dock activity includes truck idling, reefer activity (refrigerator truck/cold storage), deliveries, backup alarms, trailer docking including a combination of tractor trailer semi-trucks, two-axle delivery trucks, and background operation activities. The reference noise level measurement represents multiple concurrent noise sources, including trucks with their engines idling based on actual observed activities. However, the primary source noise activity is related to the docking activities, backup alarms and refrigerator units, not extended truck idling. As explained in the Draft EIR, the operational noise levels associated with the Project, including loading dock activity and truck movements, would not exceed the daytime and nighttime exterior noise level standards, and operational noise impacts would be less than significant at the nearby noise-sensitive receiver locations. (Appendix M-2)

In addition, the Project's air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments, including three-minute truck idling limits (MM-AQ-17 and MM-AQ-22) and electrical hookups at all transport refrigeration units (TRUs) loading docks (MM-AQ-8). Please see Recirculated Section 4.2, Air Quality, for a detailed discussion and list of the mitigation measures being added to the Project. March JPA will monitor compliance through the MMRP. With regard to the 2003 Settlement Agreement, please see Topical Response 4 – Project Consistency.

I-788.15 This comment questions "Why was it not considered part of your plan?" It is unclear as to what the commenter is referring to in this comment. As such, no further response is provided.

I-788.16 This comment asks who will ensure that mitigation measures are followed when March JPA sunsets. In response to this comment, please see Topical Response 9 – Long-Term Project Implementation and Enforcement.

The remainder of this comment is similar to Comment FL-G.7 of Form Letter G – Traffic. In response to this comment, please see Form Letter G Response.

I-788.17 This comment cites general social and environmental concerns, including air pollution, water pollution, increased crime and traffic, increase of homeless and vagrant camps, a loss of aesthetics and scenic vistas, economic opportunity, and health risk for residents. The Draft EIR includes analysis for all the environmental topics raised in this comment through Chapter 4, Environmental Analysis. Please see Topical Response 1 – Aesthetics, regarding the Project's aesthetics impacts. In addition, please see Recirculated Section 4.2, Air Quality, for further information regarding air quality, health risks, and the Project's air quality and GHG project design features and mitigation measures, which have been revised and expanded to incorporate additional feasible mitigation in response to comments.

I-788.18 This comment summarizes the proposed Project, expresses general concerns about the Draft EIR and questions the jobs analysis in the Draft EIR. In response to this comment, please see Topical Response 5 – Jobs. Public benefits provided by the Project would include increased job opportunities for local residents, preservation of open space, extension of the roadway infrastructure and the pedestrian and bicycle circulation system, a new approximately 60-acre public park, and construction of the Meridian Fire Station, at the intersection of Opportunity Way and Meridian Parkway (see Topical Response 6 - Meridian Fire Station, for additional details). The comment also alleges the EIR mitigation measures are not supported by evidence. To the contrary, throughout the Draft EIR, the analysis explains how the mitigation measures are intended to reduced the Project's impacts.

I-788.19 This comment raises concerns regarding public engagement. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. This comment also discusses a separate project located near Air Force Village West. This comment does not raise issues or concerns regarding the adequacy of the environmental analysis in the Draft EIR. The comment generally references construction impacts, views, light and noise, which are all addressed in the environmental analysis in the Draft EIR.

I-788.20 This comment states the Project site was not intended for development. As discussed in Recirculated Section 4.10, Land Use and Planning, since the development of the March JPA General Plan in 1999, the Project site has been designated for development. Although Exhibit 5-1 of the March JPA General Plan identifies the former Weapons Storage Area as SKR Open Space and the remainder of the Project site as SKR Management Area, the General Plan explains the intent to purchase better quality SKR habitat elsewhere so that "the lands currently designated for SKR management and open space purposes will be available for development." Figure 1-4, Land Use Plan, of the March JPA General Plan designates the former Weapons Storage Area as Park/Recreation/Open Space and the remainder of the Project site as Business Park. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. The swap of March JPA lands, including the Project site, for more and better quality SKR habitat was the subject of the 2012 Settlement Agreement with the Center for Biological Diversity and San Bernardino Valley Audubon Society (Appendix S). Under the CBD Settlement Agreement, the land uses were inverted, with the Weapons Storage Area identified for development, along with a 60-acre park, and the remainder of the Project site identified as a conservation easement (see Figure 3-4 of the Draft EIR). Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of the EIR. The Conservation Easement would provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses.

I-788.21 This comment questions public engagement. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. With regard to an alternative without warehouses, please see Topical Response 8 – Alternatives, which includes the analysis of Alternative 5 – Non-Industrial Alternative.

I-788.22 This comment presents a chart used by the US EPA for public engagement. The comment does not raise specific issues or questions about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-788.23 This comment is similar to comments raised previously by the commenter regarding public engagement. Please refer to Response I-788.21 above. The comment does not raise specific issues or questions about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-788.24 This comment discusses the commenter's contacts and communications with March JPA regarding information requests, complaints about existing warehouses tenants and other activity and questions enforcement and accountability under the Draft EIR for the proposed Project. Regarding support received by outside parties, March JPA responded to a public records request from Mr. Shearer on April 17, 2023. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours

of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

Regarding the reversion of March JPA's land use authority to the County in 2025, please see Topical Response 9 – Long-Term Project Implementation and Enforcement. The Draft EIR includes the information needed for evaluation and review of the Project's potential impacts, and the required Project mitigation measures will be included in the MMRP, which will provide for monitoring, implementation, and enforcement of all mitigation measures, including those for noise, air and light pollution. Please see Section 4.11, Noise, for information regarding March JPA's noise standards and noise impacts.

Regarding wildlife concerns, the Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity.

I-788.25 With regard to public engagement, please refer to Response I-788.21 above. This comment requests a non-industrial alternative to the Project. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated. The remainder of this comment is similar to Comment FL-E.5 of Form Letter E – Project Consistency. In response to this comment, please see Form Letter E Response

I-788.26 This comment is similar to Comment FL-E.6 of Form Letter E – Project Consistency. In response to this comment, please see Form Letter E Response

I-788.27 This comment is similar to Comment FL-E.7 of Form Letter E – Project Consistency. In response to this comment, please see Form Letter E Response.

I-788.28 This comment questions how the Project aligns with the goals of the 2003 and CBD Settlement Agreements. In response to this comment, please see Topical Response 4 – Project Consistency.

I-788.29 This comment is similar to Comment FL-E.8 of Form Letter E – Project Consistency. In response to this comment, please see Form Letter E Response.

I-788.30 This comment is similar to Comment FL-E.9 of Form Letter E – Project Consistency. In response to this comment, please see Form Letter E Response.

I-788.31 This comment expresses general opposition to the Project and summarizes and repeats earlier comments. The comment also includes images of Exhibit B of the Final Reuse Plan and Table 1-1 of the General Plan. Please see Responses I-788.21 and I-788.22, and I-788.25 through I-788.30, above. Additionally, please see Recirculated Section 4.10, Land Use and Planning, for further discussion regarding the Final Reuse Plan and March JPA General Plan. The comment also refers to public land. The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant.

I-788.32 This comment refers to the March JPA General Plan and includes images of Exhibits 5-1 and 5-4. Please see Response I-788.20 above regarding the original intent for development of the Project site. The comment further references the draft update to the March JPA General Plan but this document was never adopted. Please see Response I-788-30, above regarding the Project's compatibility with surrounding uses.

I-788.33 This comment questions whether the proposed Specific Plan's definition of Mixed Use is consistent with the General Plan's definition regarding warehousing. The March JPA General Plan excludes "major warehousing uses" from Mixed Use designated parcels. The proposed Specific Plan includes business enterprise within the Mixed Use designation. Business enterprise use is not major warehousing and is intended to provide a transitional environment that allows for limited commercial and office uses in conjunction with small scale industrial warehouse activity. Under Table 3-1, West Campus Upper Plateau Specific Plan Land Use Table, of the proposed Specific Plan, all major warehousing uses (Warehouse – Medium, Warehouse – Heavy, High Cube Transload and Short-Term Storage Warehouse, High Cube Fulfillment Warehouse, High Cube Code Storage Warehouse, Parcel Delivery Terminal) are prohibited under the Mixed Use designation.

Under Table 3-2 Development Standards, of the Specific Plan, Business Park and Mixed Use buildings greater than 100,000 square feet are required to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. The proposed Specific Plan's Mixed Use definition is consistent with the March JPA General Plan. The comment also refers to the privatization of public land. The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant.

I-788.34 This comment is about the general trend of warehouse development in Western Riverside County. The comment does not raise specific issues or questions about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-788.35 This comment expresses general opposition to the Project and does not raise specific issues or questions about the environmental analysis included in the Draft EIR. The comment incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. In response to this comment, please see Topical Response 8 - Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. The comment also states that the Project would place warehouses in the middle of a residential neighborhood. To clarify, the Project site is not developed with residential uses or designated for residential development. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park

Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of the EIR. The Conservation Easement would provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.

I-788.36 This comment raises concerns regarding the Draft EIR's analysis of alternative sites and the lack of a non-warehouse alternative. The comment further speculates, without support, that the Draft EIR's rejection of an alternate site is pre-decisional. "Although CEQA requires that an EIR identify alternatives to a project, it does not expressly require a discussion of alternative project locations. ([Pub. Res. Code] §§ 21001, subd. (g), 21002.1, subd. (a), 21061.) The CEQA Guidelines require a description of 'a range of reasonable alternatives to the project, or to the location of the project,' implying that an agency may evaluate on-site alternatives, off-site alternatives, or both. (CEQA Guidelines, § 15126.6, subd. (a).)" *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 491. Chapter 6, Alternatives, of the Draft EIR considered and dismissed an alternate site. In response to the remainder of this comment, please see Topical Response 8 – Alternatives, for the analysis and evaluation of Alternative 5 - Non-Industrial Alternative. The comment also describes the Project site as 'public land.' The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant.

I-788.37 This comment requests an alternative without industrial uses. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated.

I-788.38 This comment expresses support for Alternative 1 – No Project Alternative. The comment further expresses skepticism in the enforcement of mitigation measures. March JPA will monitor compliance through the MMRP. The comment does not raise specific issues or questions about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-788.39 This comment requests an alternative without industrial uses. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated.

I-788.40 This comment describes and expresses support for three other alternatives to the proposed Project: "The Campus Approach," "The Veterans Village Approach," and "The State or County Park Approach." See Topical Response 8 – Alternatives, for discussion regarding these suggested alternatives.

I-788.41 This comment states that the Draft EIR did not evaluate cumulative impacts. Throughout Chapter 4, Environmental Analysis, within each section of the Draft EIR (i.e., Sections 4.1 through 4.18), potential cumulative effects were evaluated and disclosed in compliance with the requirements of CEQA. The comment states that different datasets were used throughout the document. As outlined in detail in CEQA Guidelines Section 15130, the cumulative analysis in an EIR can be based on either a list of past, present, and probable future projects producing related statewide plan, or related planning document. CEQA Guidelines Section 15130(b)(3) states that lead agencies should define the geographic scope of the area affected by the cumulative effect. As discussed in detail in Topical Response 7 – Cumulative Projects, the EIR identifies the geographic scope for each environmental topic and the method of

evaluation, consistent with the requirements of CEQA. For further information regarding cumulative projects and cumulative impacts, please see Topical Response 7 – Cumulative Projects.

I-788.42 This comment questions the calculation and characteristics of jobs anticipated to be created by the proposed Project. In response to this comment, please see Topical Response 5 – Jobs.

I-788.43 This comment requests an alternative to specifically employ college-educated workers. This comment is outside the scope of CEQA and does not raise specific issues or questions about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-788.44 This comment describes socioeconomic conditions in the Project vicinity and Western Riverside County and questions the likelihood the Project would employ local residents. In response to this comment, please see Topical Response 5 – Jobs, for a discussion of local employment. The comment further raises concerns regarding potential traffic impacts on the roadway system. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. Housing is addressed in Section 4.12, Population and Housing, of the Draft EIR.

I-788.45 This comment discusses economic outlooks and gross domestic product, as well as socioeconomic conditions in the region and industrial job generation. This comment refers to general issues beyond the scope of the Project and the environmental analysis included in the Draft EIR. As such, no further response is provided. Specific comments regarding the Draft EIR are provided and responded to above and below.

I-788.46 This comment discusses advances in automation and the potential effect that could have on economic conditions in Western Riverside County. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. As such, no further response is provided.

I-788.47 This comment expresses general concern about the jobs associated with the proposed Project. In response to this comment, please see Topical Response 5 – Jobs, for a discussion of local employment. This comment does not raise specific issues or questions about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-788.48 This comment states that the Draft EIR does not sufficiently address cumulative traffic impacts. Most of this comment is repetitive of the commenter's prior comments. As such, please refer to Responses I-788.11 through I-788.13, I-788.15 and I-788.16 above. Also, please see Topical Response 7 – Cumulative Projects.

The commenter requests that the traffic analysis look at a 5-mile radius from the Project site. Please refer to Response I-788.12 above. Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

I-788.49 This comment asks about the funding and mitigation for fixing neighborhood roads, and enforcement of truck routes. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Regarding funding, commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[3] Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Additionally, regarding the transfer of March JPA's land use authority in 2025, please see Topical Response 9 – Long-Term Project Implementation and Enforcement.

I-788.50 This comment acknowledges the Draft EIR's determination of significant and unavoidable air quality impacts and generally claims there are deficiencies in the analysis. Recirculated Section 4.2, Air Quality, assessed the Project's air quality impacts and health risks. More specific issues are addressed in responses below.

I-788.51 This comment is the same as Comment FL-B.5 of Form Letter B – Air Quality. In response to this comment, please see Form Letter B Response.

I-788.52 This comment is the same as Comments FL-B.6 and FL-B.7 of Form Letter B – Air Quality. In response to this comment, please see Form Letter B Response. The comment also repeats a question regarding zero emissions raised in Comment I-788.3 above. As such, please refer to Response I-788.3 above.

I-788.53 This comment is the same as Comments FL-B.8 through FL-B.10 of Form Letter B – Air Quality. In response to this comment, please see Form Letter B Response. Additionally, this comment notes the potential toxic nature of parts of the munitions bunkers that would be removed under the proposed Project. In response to this comment, please see Recirculated Section 4.8, Hazards and Hazardous Materials, where additional information about the munitions bunkers is provided.

I-788.54 This comment is the same as Comment FL-B.11 of Form Letter B – Air Quality. In response to this comment, please see Form Letter B Response.

[3] https://www.dmv.ca.gov/portal/dmv-research-reports/department-of-motor-vehicles-dmv-performance-reports/where-did-your-2020-fees-go/

I-788.55 This comment is the same as Comment FL-B.12 of Form Letter B – Air Quality. In response to this comment, please see Form Letter B Response.

I-788.56 This comment questions the jobs information included in the Draft EIR. In response to this comment, please see Topical Response 5 – Jobs.

I-788.57 This concluding comment is conclusory in nature and offers the commenter's suggestions that a community advisory board be created and that March JPA advance one of the alternate plans recommended earlier in the comment letter. The comment also urges March JPA to reconsider the Project. The comment does not discuss the contents of the Draft EIR or raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided. Responses to the commenter's specific comments on the Draft EIR are provided and responded to above.

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From: Jen L <jlarrattsmith@gmail.com>
Sent: Thursday, March 9, 2023 6:35 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; Kevin Jefferies Riv Co Dist 1; Perry, Jim; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo; EEdwards@riversideca.gov; Plascencia, Gaby; Hemenway, Steve; ClCervantes@riversideca.gov; 2mayor@riversideca.gov; Ronaldo Fierro; Elizalde, Rafael; Michael McCarthy; Jerry Shearer Jr.; Pete Elliott; Aaron Bushong; aesilva4@earthlink.net; Jing Sequoia
Subject: R-NOW Public Comment for the West Campus Upper Plateau DEIR
Attachments: R-NOW Alternate Plans.pdf

Dear Mr. Fairbanks,

Please see the attached letter written on behalf of the R-NOW Board of Directors. As the Draft EIR for the West Campus Upper Plateau did not have alternate plans with non-industrial land use, the community has drafted three alternate land uses for the West Campus Upper Plateau.

Thank you for your consideration on this matter.

Sincerely,

Jen Larratt-Smith
Chair, R-NOW

Jennifer Larratt-Smith, Chair
19069 Van Buren Blvd #114-314
Riverside, CA 92508
951-384-1916
jlarrattsmith@gmail.com

Mar 9, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report, State Clearhouse No. 2021110304

Dear Mr. Fairbanks:

I write on behalf of R-NOW's Board of Directors in response to the Draft Environmetnal Impact Report (DEIR) for the West Campus Upper Plateau. My primary reasons is to submit three alternate land use plans generated by the community; but first, I want to set the context by detailing the relationship R-NOW has had with the March JPA over the past year. I ask that the March Joint Powers Authority (JPA) and the Commission consider community input in determining land use as your founding documents — the General Plan (1999) and the Final Reuse Plan (1994) — urge you to do.

I-789.1

Background: A Community Movement Opposing Warehouses

As you are well aware, R-NOW formed approximately a year ago at a developer's meeting in opposition to the West Campus Upper Plateau proposal. At that February 24, 2022 meeting, the developer presented a footprint similar to the one in the DEIR, which now includes over 4.7 million square feet of industrial warehouses in an area surroudned on more than three sides by sensitive receptors: residential homes as well as a church which houses a thriving pre-school. The community raised objections at that time, but because developers largely ignored the relevant questions in the Zoom chat, and our own Councilmember, who in spite of supposedly

I-789.2

being a neutral Commission vote, was on the Zoom meeting praising the developers, saying, "I am very proud to stand with them,"[1] angered residents began to organize.

As many community members could not take time off their busy work and family schedules to attend Wednesday, 3 pm JPA Commission meetings, we began to email. At this point, the Commission has received hundreds of emails from R-NOW members with concerns about the development, urging Commission members to consider the negative impact it will have on surrounding communities.

Four R-NOW members met with Timothy Reeves, Grace Martin, Adam Collier, and you on April 21, 2022. At that meeting, we shared our concern about the West Campus Upper Plateau proposal. At that meeting, we reiterated our belief that his piece of land is unique. Unlike the many industrial warehouse complexes the Lewis Group has built, this one encroaches in a unique way upon our residential neighborhoods, as it is surrounded on more than three sides by homes. During the meeting, Adam Collier admitted that, to his knowledge, The Lewis Group has never built an industrial complex in an area like this before. Given the unprecedented negative impact that this development would have on the surrounding community, we urged you to consider non-industrial alternatives.

I-789.2 Cont.

In that meeting, the developer and the JPA staff mentioned the need for low-density development as the primary reason you are proposing an industrial complex. However, in that meeting, we pointed out that most of the land has C2 zoning, the same zoning as the surrounding neighborhoods. Therefore, there are alternative projects that could be built there, including residential homes or high-tech business parks. Please specify in the final EIR what other land uses C2 allow for and why you did not pursue these options.

I-789.3

We left the meeting hoping that some of our concerns might lead to tangible changes in the project and continued to engage through public comment at meetings, emails, and petitions in the ensuing months. However, when the DEIR was released last month, it became clear that our feedback fell on deaf ears. There is no non-industrial alternative plan in the DEIR.

I-789.4

Our numbers steadily grew, as did our voice. Last May we submitted a petition with over 2,000 signatures of concerned residents, mostly from Riverside, Perris, and Moreno Valley, informing the Commission that there is widespread community concern about the plan as is. (Under separate cover, I submitted the now close to 2,800 signatures as public comment earlier on in January.) It went largely ignored.

I-789.5

[1] Video of Councilmember Chuck Conder's statement on February 24, 2022: https://riversideca.granicus.com/player/clip/5238?&redirect=true&h=ae844f6bc6ce6050d42195ec26c4320b

In May we also hosted an R-NOW meeting, where the now Chair of the Commission, our Councilmember, attended and fed misinformation to the public regarding the development. He said repeatedly that the DDA restricted him from voting no, that it is illegal for him to do so, a statement that would indicate he is pre-decisional.[2] He repeated this misconception at a September 6 city council meeting in spite of the fact that his own City Attorney disagrees with this interpretation of the DDA.[3]

I-789.5 Cont.

On August 18, 2022, the developer had a public information night for the public. Over 100 members attended. We wrote comments and even signed a straw poll at the event. According to the straw poll, the attendees were unanimous, signing that they wanted non-industrial alternatives for this piece of land.

I-789.6

On October 26, 2022, in spite of community opposition and before the DEIR was even released, the Commission voted to amend the DDA and approve a Schedule of Payment for the development. It included payouts for the construction of four (yet unapproved) buildings. This looked pre-decisional to R-NOW, and we submitted a letter on November 28, 2022 informing you of this. It is also baffling to us that the same developer has been allowed to have a non-competitive agreement and option to buy every parcel of taxpayer land for their own profits for the past 30 years. Industrial warehouses are owned mostly by people not in the community and bring in trucks and pollution of workers who are travelling out of our area. They are bad economic investments if we are hoping to prosper the local community. The only person who truly profits off the land in this scenario is Randall Lewis. Of what benefit besides your dubious job claims (to be addressed later in this letter) would these monstrosities give to the community?

I-789.7

I-789.8

We also visited the only evening public comment the March Joint Powers Authority was willing to have on January 11, 2023 with approximately 100 residents online and inperson. 40 speakers shared their opposition to the West Campus Upper Plateau. There were touching testimonies at this meeting, including a mother fighting for her child after another had died of cancer which she had in part because of environmental factors. The comments were unanimously in opposition. No one spoke in favor of the project. At that meeting we unanimously asked for a community advisory group similar to the TAC, which would give formal recommendations to the Commission. The Executive Director reached out the next day, but other than trying to get us to meet with the developer and go to yet another "community engagement meeting" which the developer had in May 9, these meetings proved fruitless. After meetings and emails back and

I-789.9

[2] Clips of Councilmember Conder at May R-NOW meeting:
https://riversideca.granicus.com/player/clip/5239?&redirect=true&h=22f3c4bf4f7e312a83a042b12c844ffa &
https://riversideca.granicus.com/player/clip/5242?&redirect=true&h=99ab66fed54c91fd9db464b08a4e6a57

[3] Video clips from September 6, 2022 Riverside City Council Meeting:
https://riversideca.granicus.com/player/clip/5247?&redirect=true&h=5e72b72100729dd1121f378e99b162f1 &
https://riversideca.granicus.com/player/clip/5248?&redirect=true&h=7539b5b12d15673c348a77f2d09275e4

forth, the Executive Director told us that they will not form an advisory group in spite of their clear ability to do so in their bylaws because the March JPA is sunsetting soon.

I-789.9 Cont.

One of our R-NOW members, Jerry Shearer, has submitted a Public Information Act request asking for emails in support of the West Campus Upper Plateau. While the agency continues to ask for extensions, you yourself relayed privately to him that you have yet to find any.

We have been steadily and persistently engaging the process and the March JPA throughout the past year, so it is inexcusable that you have not considered our feedback or asked the developer to alter their plan in any way. The West Campus Upper Plateau proposal has not reduced one square inch of industrial development since February 24, 2022. If anything, it has increased the square footage since it has clarified that the business park parcels will also be industrial. Why weren't non-industrial plans considered?

I-789.10

The March JPA has not acted in good faith with the community. And in fact, the Chair of your Commission has been making inappropriate public statements that he cannot and will not vote no on this project. I have video proof of these pre-decisional statements. How is a public supposed to trust that the March JPA will consider the interests of the community in such a climate?

Lack of Responsiveness and Inconsistency with Founding Documents

The most disappointing part of our current situation is that it is in the March JPA's DNA to incorporate community preferences when repurposing our taxpayer land. Many of your founding documents address this, but these were all ignored in your DEIR.

I-789.11

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million

I-789.12

square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

I-789.12
Cont.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

> "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
> b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
> d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from

Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-789.12 Cont.

Non-Industrial Alternate Plans

As neither the JPA nor the applicant have shown interest in discussing nor offering alternate plans to industrial and logistics, members of the R-NOW community have worked with concerned members of government, business, and community to develop three reasonable alternatives to your plan for the West Campus Upper Plateau. In the past, the JPA, the developer, and Commission members blithely dismissed ideas proposed by the community, everything from a solar farm and energy storage facility to a winery to mixed use residential and commercial centers. All reasonable ideas seemed to fall on predetermined ears.

However, we (perhaps naively) remain hopeful that a course correction is possible. We believe the JPA and the developer's legacy does not have to be more warehouses pollution our air, jamming our roads, and bringing little to no benefit to our community. We believe the alternatives presented below would better serve the JPA's overall mission to repurpose federal land for the benefit of the community and would give Randall Lewis the opportunity to live up to the legacy he is hoping to establish in innovation, strategy, and sustainable development.

I-789.13

Today R-NOW is presenting three viable alternate plans for your consideration, alternate projects with considerable appeal to the community and with traits of realistic development opportunities for the JPA and the applicant. We hope that you will seriously consider these ideas, as we believe they would bring considerable community benefit and be compatible with adjacent land uses.

1. Alternate plan #1: The Campus Approach
   - *Concept*: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
   - *Environmental Analysis*: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology,

public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· *Project Objectives*: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus not would not be connected under this plan).

· *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open-space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and a unique ecological habitat.

2. Alternate plan #2: The Veterans Village Approach

· *Concept*: A veteran's village that incorporates open-space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· *Environmental Analysis*: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· *Project Objectives*: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open-space. This plan would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-789.13 Cont.

3. Alternate plan #3: The State or County Park Approach

· *Concept*: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· *Environmental Analysis*: These public parks help revitalize communities impacted by the closure of the military bases, providing close to home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· *Project Objectives*: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offer residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses. And it is easily the most popular alternate plan offered here. The public is aware of and has asked for this plan as their clear first choice.

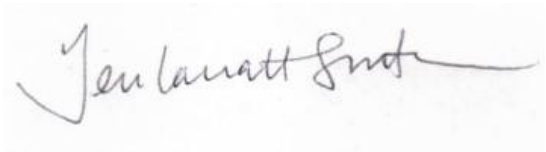
I-789.13 Cont.

R-NOW members have even spoken with the National Parks Service about making alternate plan #3 a reality. There is funding available to do this and all agencies (JPA and the four member agencies) would profit from the establishment of such a park. The JPA could engage with the National Parks Service, for example, and initiate a BRAC agreement to purchase this incredibly unique land and preserve the entire property for the very reasons identified in the 2012 Center for Biological Diversity agreement which seeks to preserve a delicate desert riparian ecosystem, preserve historic and cultural artifacts (hidden well within your draft EIR so much so that I have yet to discover them), and protect (without discretion) threatened or endangered species like the Stephen's Kangaroo Rat and the burrowing owls located at the northern end of the property. Such an agreement would pay the JPA member agencies and immensely benefit the surrounding community by giving them recreation opportunities and serving as a buffer from the dreaded industrial sprawl that you are advancing without restraint. This solution is feasible, positive from all points of view, and something you have control over. It would serve as a compromise for all involved and would not negatively impact the airport/USAF.

We are hopeful that you will consider the options presented and would be happy to speak with you further should you decide to further investigate any of these three options.

Thank you for the opportunity for us to provide comments on this project. Please feel free to contact me with any questions. I-789.13 Cont.

Sincerely,



Jennifer Larratt-Smith
Chair, R-NOW

Letter I-789

Jen Larratt-Smith
March 9, 2023

I-789.1 This comment is introductory in nature and does not raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-789.2 This comment provides background about the formation of R-NOW and previous meetings that occurred with the Project Applicant and March JPA prior to the release of the Draft EIR. The comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

I-789.3 This comment is similar to Comment FL-E.5 of Form Letter E – Project Consistency. In response to this comment, please see Form Letter E Response.

I-789.4 This comment requests evaluation of a non-industrial alternative. In response to this comment, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

I-789.5 This comment discusses comments made by a Councilmember as well as references the petition submitted by the commenter. The comment does not discuss the contents of the Draft EIR or raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided. The responses to the comments made in the petition referenced by the comment are provided in responses to Comment Letter I-4.

I-789.6 This comment asserts the community's interest in a non-industrial alternative. In response to this comment, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

I-789.7 This comment discusses the Disposition and Development Agreement (DDA) and actions undertaken by the Joint Powers Commission related to the DDA. In response to this comment, please see Topical Response 10 – Partial Assignment of DDA.

I-789.8 This comment discusses the ownership of parcels and warehouses and offers the commenter's opinion on the economic viability of warehouse uses. The comment does not discuss the contents of the Draft EIR or raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-789.9 This comment discusses public meetings, the request to form a community advisory group, and communications with March JPA. The comment also notes that March JPA is sunsetting soon. This comment does not discuss the contents of the Draft EIR or raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided. However, for information regarding the transfer of March JPA's land use authority,

please see Topical Response 9 - Long-Term Project Implementation and Enforcement. For responses to comments made at the Public Meeting on January 11, 2023, referenced by the comment, please see Section 6 – Public Meeting Response to Comments.

I-789.10 This comment discusses ongoing communications with March JPA and questions why non-industrial plans were not considered. Regarding support received by outside parties, March JPA responded to a public records request from Mr. Shearer on April 17, 2023. In response to non-industrial plans, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

I-789.11 This comment expresses disappointment that the community preferences were not taken into consideration for the proposed Project. The comment does not discuss the contents of the Draft EIR or raise any issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-789.12 This comment is the same as Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-789.13 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

From: Jen L <jlarrattsmith@gmail.com>
Sent: Thursday, March 9, 2023 11:57 AM
To: Dan Fairbanks
Subject: Public Comment for West Campus Upper Plateau Draft EIR, State Clearinghouse No. 2021110304
Attachments: Jen EIR letter.pdf

Dear Mr. Fairbanks,

Please see the attached letter submitted as my public comment for the West Campus Upper Plateau.

Thank you.

Sincerely,

Jen Larratt-Smith

Jennifer Larratt-Smith, Chair
19069 Van Buren Blvd #114-314
Riverside, CA 92508
951-384-1916
jlarrattsmith@gmail.com

Mar 9, 2023

Dan Fairbanks
Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: West Campus Upper Plateau, Environmental Impact Report, State Clearhouse No. 2021110304

Dear Mr. Fairbanks:

I am writing to submit comments on the draft Environmental Impact Report for the proposed West Campus Upper Plateau. As you are well aware, I founded a grassroots group of neighbors approximately a year ago at a developer's meeting in opposition to the West Campus Upper Plateau. At that February 24, 2022 meeting, the developer presented a footprint similar to the one in the DEIR, which now includes over 4.7 million square feet of industrial warehouses in an area surroudned on more than three sides by sensitive receptors: residential homes as well as a church which houses a thriving pre-school. The community raised objections at that time, but because developers largely ignored the relevant questions in the Zoom chat, and my own Councilmember, who in spite of supposedly being a neutral Commission vote, was on the Zoom meeting praising the developers, saying, "I am very proud to stand with them,"[1] angered residents began to organize.

I-790.1

As many community members could not take time off their busy work and family schedules to attend Wednesday, 3 pm JPA Commission meetings, we began to email. At this point, the Commission has received hundreds of emails from R-NOW members with concerns about the development, urging Commission members to consider the negative impact it will have on surrounding communities.

[1] Video of Councilmember Chuck Conder's statement on February 24, 2022: https://riversideca.granicus.com/player/clip/5238?&redirect=true&h=ae844f6bc6ce6050d42195ec26c4320b

Four R-NOW members met with Timothy Reeves, Grace Martin, Adam Collier, and you on April 21, 2022. At that meeting, we shared our concern about the West Campus Upper Plateau proposal. At that meeting, we reiterated our belief that his piece of land is unique. Unlike the many industrial warehouse complexes the Lewis Group has built, this one encroaches in a unique way upon our residential neighborhoods, as it is surrounded on more than three sides by homes. During the meeting, Adam Collier admitted that, to his knowledge, The Lewis Group has never built an industrial complex in an area like this before. Given the unprecedented negative impact that this development would have on the surrounding community, we urged you to consider non-industrial alternatives.

I-790.1 Cont.

In that meeting, the developer and the JPA staff mentioned the need for low-density development as the primary reason you are proposing an industrial complex. However, in that meeting, we pointed out that most of the land has C2 zoning, the same zoning as the surrounding neighborhoods. Therefore, there are alternative projects that could be built there, including residential homes or high-tech business parks. Please specify in the final EIR what other land uses C2 allow for and why you did not pursue these options.

I-790.2

We left the meeting hoping that some of our concerns might lead to tangible changes in the project and continued to engage through meetings, emails, and petitions in the ensuing months. However, when the DEIR was released last month, it became clear that our feedback fell on deaf ears. There is no non-industrial alternative plan in the DEIR.

I-790.3

Our numbers steadily grew, as did our voice. Last May we submitted a petition with over 2,000 signatures of concerned residents, mostly from Riverside, Perris, and Moreno Valley, informing the Commission that there is widespread community concern about the plan as is. (Under separate cover, I submitted the now close to 2,800 signatures as public comment earlier on in January.) It went largely ignored.

In May we also hosted an R-NOW meeting, where the now Chair of the Commission, our Councilmember, attended and fed misinformation to the public regarding the development. He said repeatedly that the DDA restricted him from voting no, that it is illegal for him to do so, a statement that would indicate he is pre-decisional.[2] He repeated this misconception at a September 6 city council meeting in spite of the fact that his own City Attorney disagrees with this interpretation of the DDA.[3]

I-790.4

[2] Clips of Councilmember Conder at May R-NOW meeting:
https://riversideca.granicus.com/player/clip/5239?&redirect=true&h=22f3c4bf4f7e312a83a042b12c844ffa &
https://riversideca.granicus.com/player/clip/5242?&redirect=true&h=99ab66fed54c91fd9db464b08a4e6a57

[3] Video clips from September 6, 2022 Riverside City Council Meeting:
https://riversideca.granicus.com/player/clip/5247?&redirect=true&h=5e72b72100729dd1121f378e99b162f1 &
https://riversideca.granicus.com/player/clip/5248?&redirect=true&h=7539b5b12d15673c348a77f2d09275e4

On August 18, 2022, the developer had a public information night for the public. Over 100 members attended. We wrote comments and even signed a straw poll at the event. According to the straw poll, the attendees were unanimous, signing that they wanted non-industrial alternatives for this piece of land.

I-790.5

On October 26, 2022, in spite of community opposition and before the DEIR was even released, the Commission voted to amend the DDA and approve a Schedule of Payment for the development. It included payouts for the construction of four (yet unapproved) buildings. This looked pre-decisional to R-NOW, and we submitted a letter on November 28, 2022 informing you of this. It is also baffling to us that the same developer has been allowed to have a non-competitive agreement and option to buy every parcel of taxpayer land for their own profits for the past 30 years. Industrial warehouses are owned mostly by people not in the community and bring in trucks and pollution of workers who are travelling out of our area. They are bad economic investments if we are hoping to prosper the local community. The only person who truly profits off the land in this scenario is Randall Lewis. Of what benefit besides your dubious job claims (to be addressed later in this letter) would these monstrosities give to the community?

I-790.6

I-790.7

We also visited the only evening public comment the March Joint Powers Authority was willing to have on January 11, 2023 with approximately 100 residents online and inperson. 40 speakers shared their opposition to the West Campus Upper Plateau. There were touching testimonies at this meeting, including a mother fighting for her child after another had died of cancer which she had in part because of environmental factors. The comments were unanimously in opposition. No one spoke in favor of the project. At that meeting we unanimously asked for a community advisory group similar to the TAC, which would give formal recommendations to the Commission. The Executive Director reached out the next day, but other than trying to get us to meet with the developer and go to yet another "community engagement meeting" which the developer had in May 9, these meetings proved fruitless. After meetings and emails back and forth, the Executive Director told us that they will not form an advisory group in spite of their clear ability to do so in their bylaws because the March JPA is sunsetting soon.

I-790.8

One of our R-NOW members, Jerry Shearer, has submitted a Public Information Act request asking for emails in support of the West Campus Upper Plateau. While the agency continues to ask for extensions, you yourself relayed privately to him that you have yet to find any.

I-790.9

We have been steadily and persistently engaging the process and the March JPA throughout the past year, so it is inexcusable that you have not considered our feedback or asked the developer to alter their plan in any way. The West Campus Upper Plateau proposal has not reduced one square inch of industrial development since February 24, 2022. If anything, it has increased the

square footage since it has clarified that the business park parcels will also be industrial. Why weren't non-industrial plans considered?

The March JPA has not acted in good faith with the community. And in fact, the Chair of your Commission has been making inappropriate public statements that he cannot and will not vote no on this project. I have video proof of these pre-decisional statements. How is a public supposed to trust that the March JPA will consider the interests of the community in such a climate?

I-790.9 Cont.

The most disappointing part of this is that it is in the March JPA's DNA to incorporate community preferences when repurposing our taxpayer land. Many of your founding documents address this, but these were all ignored in your DEIR.

I-790.10

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

I-790.11

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it

explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

> "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
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Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. I-790.11

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

In this letter, I detail many of the specific concerns I have about the West Campus Upper Plateau proposal and its Draft Environmental Impact Report (DEIR). My concerns illustrate why I believe the DEIR to be inaccurate and incomplete, neither meeting the standards of CEQA nor I-790.12

community preferences and needs. I end the letter sharing three non-industrial alternate plans drated by R-NOW members. I hope you will seriously consider my feedback. I-790.12 Cont.

2003 Settlement Agreement

I am curious as to why the 2012 Settlement Agreement with the Center for Biodiversity is listed under the Appendices of this Draft EIR, but the 2003 Settlement Agreement with CAREE and CCAEJ is not. Is there a reason it was left off the webpage? Is it no longer legally binding? Are there terms of the agreement that the current project would violate? If so, could you make these clear to the public?

For instance, I notice that in the settlement terms of the agreement there are provisions for the reduction of semi-truck emissions. Have the terms for the section 2.1 been met on semi-trucks that will be travelling to and from the project site? How will you assure the public that these provisions will be enforced? Who holds the occupants accountable? I-790.13

Have you been cooperating with AQMD to promote the use of bio-diesel or other clean fuels as outlined in 2.2.1?

I notice that in 2.5.3 the settlement asks that the developer construct physical constraints to make sure trucks cannot use Van Buren Blvd. Did the project applicant follow through with this item? I have seen semi-trucks on Van Buren every day when I drive to work. If you have not followed through on this item, are there plans to do so now? I have not seen plans for this in the project description.

Furthermore, to my knowledge, none of the March JPA sites have provided a site for a County Fire Station (2.6.3) or a Police Station (2.6.4). And while you have set aside 60 acres for a public park, you are only grading it and not providing for active recreation as outlined in the agreement (2.6.1). I note that for items 2.6.3 and 2.6.4 it specifies that you only need to provide a "site" for these amenities. However, for 2.6.1 it designates that you will actually provide the park, not merely the site for it. Have you chosen not to follow through with the terms of this settlement? If so, why and how was this decision made? I-790.14 I-790.15

I notice that the Settlement Agreement on Item 2.4.2 says "Parties agree that no land use meeting the description of Logistics Warehouse, will be developed on lots 54, 55, 56 as identified in the Approvals, or within the Industrial area west of 'Z' street if these lots are modified to realign with 'Z' street." In Exhibit A of the Settlement Agreement, "Z" Street appears to be Meridian Parkway. Clearly, this term of the settlement agreement were to protect the residential homeowners west of the project by limiting the kind of industrial land use adjacent to them. The West Campus Upper Plateau is even further west of "Z" Street and encroaches on our residential I-790.16

neighborhoods. How do you justify building an industrial complex of over 4.5 million square feet full of logistics warehouses which violates the intention behind this settlement agreement?

I request that the Final DEIR include the 2003 Settlement Agreement and that it address how it does or does not meet its terms. In the ways that it does not meet the terms of the agreement, I would like an explanation as to why the applicant has been allowed to deviate from them.

I-790.16 Cont.

Good Neighbor Guidelines

On March 30, 2022, I sent an email to Adam Collier and to you attaching the Attorney General's Best Practices and Mitigation measures asking you to address its points in the draft EIR, which you did not do. For instance, it advises that warehouses be set back at least 1000 feet from sensitive receptors, but according to your site plan, several of the 100,000 square foot warehouses on the north side are 300 feet from homes. The document also suggested a community advisory board in the early stages of the process. Although quite late in the process, R-NOW's request to form an advisory board for the March JPA but were told no in spite of close to 40 speakers asking for this at a public meeting on January 11, 2023. There are also many guidelines designed to mitigate air quality of greenhouse gas emissions that you did not include, even though you conceded that air quality would have "significant and unavoidable" impacts.

My understanding is that the March JPA has no Good Neighbor Guidelines in spite of the fact that every entity that makes up the JPA does. How is it that a public agency can refuse to adopt any of the land use limitations of its adjacent jurisdictions? It honestly makes me question the legality of public agencies like the JPA. It is almost as if they are formed to avoid accountability.

I-790.17

Even if you are not beholden to specific Guidelines, I would hope you would be beholden to your public (and recorded) spoken words and written agreements. At the September 6 City Council meeting, the Executive Director Dr. Grace Martin said in a presentation to the Council that the March JPA would "meet or exceed" the City of Riverside's Good Neighbor Guidelines, but the plan as presented violates it in several ways:

1. Mixed use zones allow warehouses in the 'business park enterprise' setting. This would not be allowed based on City of Riverside Title 19 standards, and isn't allowed in the current March JPA general plan or in any other specific plan area of the March JPA.
2. The mixed-use parcels in the southwest corner of the warehouse complex are clearly within 800' feet of the Grove Church and are 9.12 and 7.84 acres, respectively. The Grove Church is in a residential zone. At a FAR of 0.35 – the warehouses in these parcels do not currently conform to the 100,000 square feet limit for City of Riverside Title 19 standards and thus do not appear to guarantee City Guidelines would be implemented based on current parcel sizes.

3. Building heights in the industrial zone have a max height of 50 feet as shown in the Specific Plan and building plot plans. City of Riverside standards are 45 feet max height. This does not meet or exceed City guidelines, especially given that these buildings are on a hill 50 to 75 feet higher than surrounding homes in Mission Grove and Camino Del Sol. This may also fall afoul of the GNG neighborhood character goal 1 related to heights and setbacks, for industrial uses to 'minimize visual impacts.' Similarly, the warehouse complex screens industrial mega-warehouses using smaller warehouses as screens. That seems ineffective at minimizing visual impacts.
4. Health risk assessment sensitive receptors did not include the proposed park to be used for active recreation less than 100 feet from warehouses. The park is extremely likely to be used for preschool children and active recreation that will enhance breathing rates leading to higher exposures for these children. Riverside Good Neighbor Guidelines clearly state that a health risk assessment should be performed and diesel exposures to sensitive receptors (schools, parks, playgrounds, etc.) should be **minimized**. This park is likely to receive higher doses of diesel PM and NOx due to its closer proximity to the proposed warehouses yet is not included in the health risk assessment at all as a sensitive receptor location (see appendix C2 Exhibit 2-D).
5. The construction phase noise mitigation does not seem to be consistent with city Good Neighbor guidelines to 'minimize' noise, allows blasting, and allows noises starting at 6 AM until 10 PM, rather than the city 7-7 guidelines.
6. The City Good Neighbor Guidelines are in flux. The City's Land Use Committee is considering adding a 1,500 foot setbacks for warehouses over 500,000 square feet. They are also looking at revising the FAR to include cumulative impacts, not allowing more than 3x a the maximum building size within a given range. If either of these policies become a reality, the development would violate the City's guidelines.

I-790.17 Cont.

Doubtless, the March JPA will say that they are not beholden to adjacent jurisdictions and their Good Neighbor Guidelines, but it is frustrating to the community that you hold yourself to no standard but are allowed to say publicly that you will and that you do. The continued misinformation from the March JPA has not engendered trust with R-NOW over the past year.

Hazards and Hazardous Waste

The West Campus Upper Plateau is a unique site in that it has been the location of 16 munitions bunkers for almost a century. March AFRB is known for having B-52 bombers fly in and out of the base, which carried nuclear weapons. "The B-52B's maximum bomb load was 43,000 pounds (19,505 kilograms). It could carry a maximum of 27 1,000-pound conventional explosive bombs. For strategic missions, the bomber carried one Mark 6 nuclear bomb, which had a yield ranging from 8 to 160 kilotons, depending on Mod, or two Mark 21 thermonuclear bombs, each with a

I-790.18

yield of 4–5 megatons."[4] It stands to reason that the munitions bunkers constructed to hold weapons would be where nuclear weapons would be stored when not on the planes. How were they stored? How were they transported? How deep underground would they have been housed?

I-790.18 Cont.

There are many other kinds of planes and ammunition that have flown through March Airforce Base over the years as well including the Condor B2, the Keystone C4, B-29's, B-47's and KC-97's, all carrying various forms of conventional and thermonuclear armaments that would presumably be stored in the munitions bunkers.[5] Has the soil been tested for residue from any of these weapons? If so, how deep did you test in the soil? There are rumors that the munitions bunkers also housed Agent Orange and perhaps other chemical weapons that may have leeched into the soil as well. The railroad tracks that used to run along the property were rumored to have been built because the military did not want to carry chemical weapons by truck. I submitted FOIA to March Air Force Base last year requesting information on what had been stored in the munitions bunkers. They responded that they did not have these records.

Does the March JPA have records of what was stored in those bunkers? If so, please release them. The public and the decision-makers deserve to know what is in the soil before it is disturbed. If you do not have records, then it is incumbent upon the March JPA to test for all possible toxic substances that may have leeched into the soil. You will not find what you have not tested for. And I submit that your hazards section does not do a comprehensive test of the soil to ensure safety to the surrounding residents given the uniqueness of the munitions bunkers history, especially given that there is also an unexploded munitions ordinance that has not been properly addressed or mitigated in the Draft EIR either.

I-790.19 Cont.

I request that rather than spot test, the March JPA ask for grid testing of the entire West Campus Upper Plateau, especially in the areas where the soil will be disturbed. I also ask that the testing go deeper than merely five feet. How were weapons stored? Were they at ground level? If they were stored below ground, presumably any harmful substances might would be lower than five feet, especially when it may have leeched into the soil decades ago.

The March Air Force Base (and The West Campus Upper Plateau in particular) has also been designated as a Superfund site. Why weren't substances known to be present at the March Base tested for in your Draft EIR? The EPA has a full contaminants list for the March Air Force Base at this site.[6] I request that the site be tested for all of the contaminants known to be on the base. How did you determine which chemicals to test for and which to omit? Why didn't you test of known contaminants (e.g. PFAS, percholorate) that are likely to be on site given the operations of the area?

I-790.20 Cont.

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[4] Source: https://www.thisdayinaviation.com/tag/march-air-force-base/
[5] Source: https://www.militarymuseum.org/MarchAFB.html
[6] Contaminant list:
https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.contams&id=0902761

I also note that on the EPA website it only passes three of the five performance measures. Currently, there is a "no" on performance measures for Construction and Sitewide Ready for Anticipated Use.[7] Can you please explain why these factors are still rated as "no"? What additional mitigations might the March JPA need to take given that these performance measures have not been cleared by the EPA yet? Can you tell the public what specific mitigations still need to occur to make the site ready for anticipated use? I-790.21

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchlorothylene, radioactivity (within bunkers), the contaminants identified on the EPA contaminant list for the site, and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers. I-790.22

In the Final EIR, please also address how the PCB-contaminated soil is to be treated, given its concentration is well over a ppm. I-790.23

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, I ask that these materials be removed. I-790.24

Environmental Justice

According to SB 1000 which was signed into law in 2016, local jurisdictions need to identify environmentally disadvantaged communities in their regions and address environmental justice in their General Plans. Neither the General Plan for the March JPA nor the Draft EIR for the West Campus Upper Plateau include an Environmental Justice section. I-790.25

[7] Perfomance Measures for March AFRB site: https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Healthenv&id=0902761#Perform

CalEnviroScreen is the state indicator of "Pollution Burden." It weighs pollution exposure and socioeconomic factors in the affected census tract. Two socioeconomically disadvantaged census tracts in our area are directly affected by this project.

Tract 06065046700 is overlaid directly on the March JPA planning area. It is 98th percentile pollution burden and has a population of 4721.

Tract 06065042505 is north of Alessandro and East of the 215 along the old 215 frontage road. It is 99th percentile burden and has a population of 3542.

The picture below is from the Warehouse CITY app: https://radicalresearch.shinyapps.io/WarehouseCITY/. It shows both the area with the 06065042505 tract moused over.



I-790.26

As General Plan (1999) Goal 2, Policy 2.4 directs the March JPA to "protect.. adjacent residents," the March JPA should reject upzoning the West Campus Upper Plateau to allow for industrial uses given the heavy industrial uses that already surround these communities. They cannot afford further degradation of their air quality and quality of life.

I-790.27

At the very least, the March JPA needs to be transparent as to ways these already environmentally-vulnerable communities will be negatively impacted by this project. Please include an Environmental Justice section in your Final EIR detailing impacts and offering mitigations to address environmental justice.

Jobs

Jobs has been the only justification I have heard from the March JPA as to why they are proposing industrial warehouses for the West Campus Upper Plateau. However, this justification doesn't hold up to further scrutiny..

I-790.28

Consider:

1. **There are not enough unemployed people in the local area to fill the number of jobs that the logistics industry claims they are creating.** If we look at the population in our region, there are approximately 630,000 residents (Riverside 318k, MoVal, 212k, Perris 80k, Mead Valley 20k). Based on employment statistics, we can safely estimate approximately 300,000 employed working-age people and 11,000 unemployed (based on the 3.5% unemployment rate). Even adding in another 100 or 200k from unincorporated areas like Woodcrest, Nuevo, and Sun City, there is no where near enough capacity for the jobs the industrial sector is claiming. The World Logistics Center is supposed to generate 35,000 jobs[8]. Stoneridge Commerce Center is 10,000+ jobs.[9] There's no way this region can add 45,000 jobs in just warehouses locally. Even if everyone who turned 18 decided to work in warehouses for 10 straight years.
2. **The majority of warehouse jobs are low-wage and temporary work with reduced hours, and workers could not afford to live in the local area.** Per Indeed.com, the average annual salary of a warehouse associate in Riverside, CA is $35,160.[10] Even if we assume a resident is fortunate enough to find a warehouse job that provides 40 hours a week for 12 months out of the year, a rare find in this industry, a person could not afford to live in the local area. According to rentdata.org, the fair market rent for a 1-bedroom apartment in the 92508 zip code is $1398/per month.[11] As of January 2023, the median home price for the zip code 92508 is $667,500.[12] Even a warehouse associate were to find a rare, steady, full-time job, they would have to pay an unsustainable amount of their paycheck to rent. These jobs cannot and will not serve the local residents.
3. **The logistics industry has actually weakened the economic outlook of our region overall.** According to the SCAG December 2022 economic outlook report,[13] "In 2001, GDP per capita in Riverside County and San Bernardino County were 64 percent and 69 percent of U.S. per capita GDP, respectively. When compared to the Rest of California, the ratios are worse: 52 percent and 56 percent....Moreover, by 2022, Riverside County's

I-790.29

I-790.30

I-790.31

[8] DEIR- https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32
[9] p.S-63 v_DUvTq0wy7zyk_ATUd1e_ywhJKJznH0Y5OLgU21nc43u6Hte84WB6Ia_vn9Rnu3c3NsFZDe9vF_31qm0 (ca.gov)
[10] Data obtained at https://www.indeed.com/career/warehouse-associate/salaries/Riverside--CA
[11] Data obtained at https://www.rentdata.org/lookup
[12] Data obtained at https://www.redfin.com/zipcode/92508/housing-market
[13] https://scag.ca.gov/sites/main/files/file-attachments/briefing_book_2022_final.pdf?1669774904

position had deteriorated to a per capita GDP of only 59 percent of the U.S. level and 40 percent of California. San Bernardino County was at least able to improve to 71 percent of the U.S. level, but still fell to 48 percent of the rest of California level. These numbers are alarming, especially given the success of the Logistics Industry. They imply that the impressive job growth in the Inland Empire since 2001 resulted in numerous jobs, but they tend to be relatively lower paying jobs compared to other parts of the state and nation. This explains, in part, why such a large number of workers prefer to commute into the coastal areas, despite the heavy cost involved in terms of time lost on the road. It also explains why the Inland Empire's per capita GDP has sunk to a rank of 340 out of 386 MSAs, despite being the twelfth largest by population count" (underlining added for emphasis).

I-790.31 Cont.

4. **As recently detailed in an article in the Press Enterprise,[14] the vast majority companies who own and operate the warehouses in the Inland Empire are not local.** To quote the article: "According to the study, companies with Denver, Colorado addresses are the top owners of Inland warehouse space and control 118.7 million square feet. Newport Beach came in second with 107.2 million square feet, followed by Irvine with 69.3 million, Los Angeles with 68.6 million and Chicago with 61.4 million. Of the top 15 Inland warehouse owners, the only local entry was Ontario, with 30.7 million square feet."

   Note in the table below that **none** of the March Joint Powers Authority warehouses are owned locally. This means that the business owners and the white-collar office jobs (i.e. the higher-paid employees) live outside of the region. The Inland Empire simply becomes cheap land and cheap labor for them. In other words, our resources are being exploited. We pay all the costs in terms of air quality, traffic, and decreased quality of life but reap very few of the benefits. The community demands better use of this land that prioritizes local business and prioritizes quality high-paying jobs.

I-790.32

[14] Source: https://www.pressenterprise.com/2023/02/27/how-many-inland-empire-warehouses-are-locally-owned-does-it-matter/



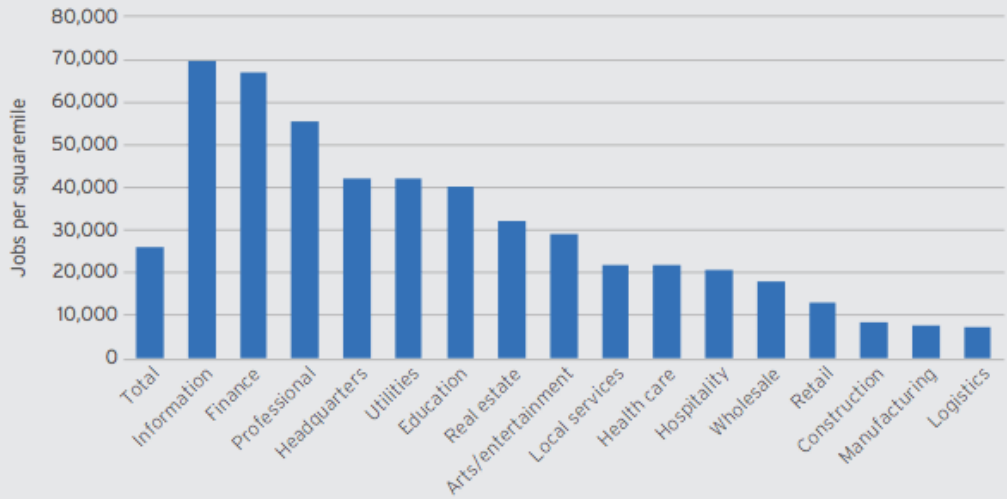
5. **Industrial is the worst land use possible when it comes to job generation.** Warehouses provide 0.000212 jobs per square foot and are the lowest economic jobs density of any professional category. It is literally the worst job creator per unit of land there is.

I-790.32 Cont.

I-790.33

Figure 10. Jobs in advanced services sectors are located in the densest parts of metro areas on average

Job density by sector in 2015



Note: Agriculture and mining are not shown due to their small number of jobs but count toward the total.
Source: Brookings analysis of Census LEHD Origin-Destination Employment Statistics

I-790.33 Cont.

6. **Automation may lead to mass unemployment if we overinvest in this industry.** According to the December 2022 SCAG report quoted above: "Over the long-run, Logistics will likely go through a transformation as advances in automation and artificial intelligence displace workers. This means that the industry may continue to thrive, but it may not support the same number of workers as it presently does. In turn, the region must look to other industries as sources of employment and output growth… There will be further costs from the expansion of the Logistics Sector if the result of the expansion means that there will be less industrial space available in the future for industries which are able to add more value to the economy per square foot." (underlining added for emphasis).

I-790.34

I urge the March JPA to think harder before making the jobs argument for the West Campus Upper Plateau. We do not need 2,600 more warehouse jobs in this region. We are already oversaturated with the logistics industry and need to think more creatively about land uses so that it benefits the local region and doesn't simply line the pockets of developers.

I-790.35

Greenhouse Gas Emissions

I-790.36

I have already established in the section above that job numbers generated in the DEIR are problematic. Given that the region is already creating more warehouse jobs than there are unemployed people and that most of the workers would not be able to afford to rent or own in the

local vicinity, the assumptions underlying your Greenhouse Gase Emissions VMT are fundamentally flawed. You base your VMT on the assumption that workers would actually shorten their commute because locals will want to work at the West Campus Upper Plateau. How can you make this assumption when its clear that workers will have to commute from outside the area since there are not enough physical workers in the area to fill the projected vacancies? Furthermore, the assumption that local residents will give up their current job to work a seasonal, low-paying job of hard labor, especially when it has already been established that the vast majority of jobs will not generate enough income to afford an apartment in the area, is beyond absurd. How did you generate your numbers? Can you justify your assertion that commutes will decrease from 21 miles to 16 miles? Without justification, it feels as though numbers were fabricated to downplay project impacts.

I-790.36 Cont.

I can honestly say that when I share your Greenhouse Gas VMT logic to anyone who lives in the neighborhood, the response is to laugh out loud. It is an absurd work of fiction that does not stand up to the test of common sense. Please provide substantiation that holds up in the real world. What you have presented is misleading to the public.

Population and Housing

Furthermore, once you consider the actual job numbers for the region and the fact that there are not enough local workers to fill job vacancies, you must then consider the population and housing impacts of importing workers from outside the area. The Draft EIR acknowledges the City of Riverside is mandated by state law to provide adequate housing but fails to recognize that the City is failing to meet its state-mandated goals for any of four categories of housing ranging from very-low income to above-moderate income, with very-low income housing being wholly inadequate. The City's overall compliance has been rated as "D" on a scale of "A-F". Similarly, the cities of Perris and Moreno Valley and the unincorporated areas of Riverside County have been rated "D+".[15] Nevertheless, the Draft EIR rather blithely suggests that no new housing will be needed because the employees can be housed in the surrounding communities even though there is little such current availability. The Final EIR should be corrected to reflect honestly the actual challenges presented by increasing the number of employees in an area that already lacks sufficient housing for its citizens.

I-790.37

As you can see, once the flaws in the jobs assumptions are exposed, the entire Draft EIR analysis falls like a line of dominoes.

[15] Source: https://www.ocregister.com/2023/01/17/housing-scorecard-grades-breakdown/

Traffic

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

I-790.38

You also do not analyze the potential impact on arterial streets such as Alessandro and Van Buren. While the truck routes you create are supposed to avoid these streets, anyone who drives these streets regularly to drop kids off at school or to work (as I do) know that semi-trucks violate their established truck routes all the time. Sometimes when police pull over trucks to cite drivers or when a trucker gets into an accident on one of these City streets, it backs the traffic up for hours making my children miss their morning classes. Moreover, the trucks' illicit use of these routes is precisely because of the aforementioned back up on the 215 and the 60.

I-790.39

In your DEIR analysis, you ought also to consider that trucks do 2,500 times the damage of a car to our streets and highways.[16] The impact of over 2000+ diesel trucks daily on our roads will be immense. These details need to be better factored into the maintenance costs for local roads and highways in your Final EIR.

I-790.40

Lack of Non-Industrial Alternatives

As so many community members shared at the evening public comment period at the March Joint Powers Authority Commission meeting on January 11, 2023, the community is disappointed in the Draft EIR's lack of non-industrial alternatives. We understand that the land is zoned C-2 and reject the continued repetition of mistruths that industrial warehouses are the "only thing that can be built there." We know that the developer's primary objective is to make The Lewis Group money.

As a public agency formed to repurpose excess taxpayer land, the March Joint Powers Authority ought to have a different objective - to identify land uses that serve the surrounding community.

I-790.41

[16] Source: https://www.insidescience.org/news/how-much-damage-do-heavy-trucks-do-our-roads

In spite of our steady and vocal opposition to industrial plans as detailed at the beginning of this letter, the Draft EIR contains no non-industrial alternative.

As it appears the March JPA has not yet pushed the developer to come up with alternative plans, allow me to share three options that R-NOW have identified, land uses which would actually bring benefit to the community.

1. Alternate plan #1: The Campus Approach
    - *Concept*: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
    - *Environmental Analysis*: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
    - *Project Objectives*: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus not would not be connected under this plan).
    - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open-space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and a unique ecological habitat.

2. Alternate plan #2: The Veterans Village Approach
    - *Concept*: A veteran's village that incorporates open-space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
    - *Environmental Analysis*: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in

I-790.41
Cont.

conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

- *Project Objectives*: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
- *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open-space. This plan would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach
   - *Concept*: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
   - *Environmental Analysis*: These public parks help revitalize communities impacted by the closure of the military bases, providing close to home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
   - *Project Objectives*: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
   - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offer residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses. And it is easily the most popular alternate plan offered here. The public is aware of and has asked for this plan as their clear first choice.

Members of R-NOW have already spoken with the National Parks Service about making alternate plan #3 a reality. There is funding available to do this and all agencies (JPA and the four

I-790.41 Cont.

member agencies) would profit from the establishment of such a park. The JPA could engage with the National Parks Service, for example, and initiate a BRAC agreement to purchase this incredibly unique land and preserve the entire property for the very reasons identified in the 2012 Center for Biological Diversity agreement which seeks to preserve a delicate desert riparian ecosystem, preserve historic and cultural artifacts (hidden well within your draft EIR so much so that I have yet to discover them), and protect (without discretion) threatened or endangered species like the Stephen's Kangaroo Rat and the burrowing owls located at the northern end of the property. Such an agreement would pay the JPA member agencies and immensely benefit the surrounding community by giving them recreation opportunities and serving as a buffer from the dreaded industrial sprawl that you are advancing without restraint. This solution is feasible, positive from all points of view, and something you have control over. It would serve as a compromise for all involved and would not negatively impact the airport/USAF.

I-790.41 Cont.

Conclusion

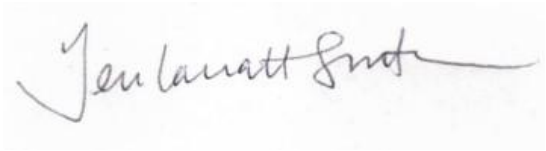
It is clear from the analysis above that the Draft EIR fails to properly convey the actual impacts of over 4.7 million square feet of warehouses in the West Campus Upper Plateau, nor does it incorporate community input or present non-industrial alternative plans. As the purpose of CEQA is to present clear and accurate information for how a project will affect the environment and the public, these oversights make this Draft EIR insufficient, and the project cannot be approved as is without being in violation of CEQA.

I-790.42

Moreover, considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial wareshouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,



Jennifer Larratt-Smith

Letter I-790

Jen Larratt-Smith
March 9, 2023

I-790.1 This comment is the same as Comments I-789.1 and I-789.2. As such, please see Responses I-789.1 and I-789.2, above.

I-790.2 This comment is the same as Comment I-789.3. As such, please see Response I-789.3, above.

I-790.3 This comment is the same as Comment I-789.4. As such, please see Response I-789.4, above.

I-790.4 This comment is the same as Comment I-789.5. As such, please see Response I-789.5, above.

I-790.5 This comment is the same as Comment I-789.6. As such, please see Response I-789.6, above.

I-790.6 This comment is the same as Comment I-789.7. As such, please see Response I-789.7, above.

I-790.7 This comment is the same as Comment I-789.8. As such, please see Response I-789.8, above.

I-790.8 This comment is the same as Comment I-789.9. As such, please see Response I-789.9, above.

I-790.9 This comment is the same as Comment I-789.10. As such, please see Response I-789.10, above.

I-790.10 This comment is the same as Comment I-789.11. As such, please see Response I-789.11, above.

I-790.11 This comment is the same as Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-790.12 This comment refers to the comments on the Draft EIR that follow. No specific issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR are raised in this particular comment. As such, no further response is provided.

I-790.13 This comment questions the relationship of the 2003 Settlement Agreement to the proposed Project. In response to this comment, please see Topical Response 4 – Project Consistency, for analysis of the Project's consistency with the 2003 Settlement Agreement.

I-790.14 This comment questions the provision of sites for a new County Fire Station and Police Station under the 2003 Settlement Agreement. Regarding the fire station site, the applicant previously dedicated a 2.12-acre parcel at the northeast corner of Meridian Parkway and Opportunity Way to the County of Riverside. As discussed in more detail in Recirculated Chapter 3, Project Description, and Topical Response 6 – Meridian Fire Station, the Project Development Agreement includes the construction of the Meridian Fire Station as a Community Benefit. Regarding the police station site, the applicant dedicated a site to the City of Riverside for a Police Station off of Barton Road in Meridian South Campus, which the City of Riverside then relinquished back. In response to this comment, please see Topical Response 4 – Project Consistency, for analysis of the Project's consistency with the 2003 Settlement Agreement.

I-790.15 This comment questions whether or not a 60-acre park would be provided. As evaluated through the Draft EIR, a 60-acre park is part of the proposed Project. This comment also asserts that the Project only includes the grading of the park, rather the provision of active recreation outlined in the 2003 Settlement Agreement. As described throughout the Draft EIR, the park "would be developed as an Active Park, including a playground, multi-use sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users." In response to this comment, please see Topical Response 4 – Project Consistency, for analysis of the Project's consistency with the 2003 Settlement Agreement.

I-790.16 This comment continues to question the relationship of the 2003 Settlement Agreement to the proposed Project. In response to this comment, please see Topical Response 4 – Project Consistency, for analysis of the Project's consistency with the 2003 Settlement Agreement.

I-790.17 This comment details previous correspondence with the developer and March JPA regarding the Attorney General's Best Practices and Mitigation Measures and indicates that it is not addressed in the Draft EIR as the commenter had requested. Presumably, the comment is referring to the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" (AG Warehouse Guidance). For an analysis of the Project's consistency with the AG Warehouse Guidance, please see to Topical Response 2 – Air Quality.

This comment questions the Project's Consistency with the City of Riverside's Good Neighbor Guidelines. For analysis of the Project's compliance with the Good Neighbor Guidelines for the County of Riverside and the City of Riverside, please see Recirculated Section 4.10, Land Use and Planning, and Topical Response 4 – Project Consistency. As discussed in Recirculated Section 4.10, Land Use and Planning, the purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses.

I-790.18 This comment questions how nuclear weapons were stored at, and transported to and from, the Project site. The comment also questions at what depth the weapons were housed. In response to this comment, for a discussion of past uses of the Specific Plan Area and a summary of environmental investigations and remedial activities, including nuclear and chemical weapons, please refer to Recirculated Section 4.8, Hazards and Hazardous Materials.

I-790.19 This comment asks about what other weapons were stored at the Project site and asks for more details about testing that has been completed at the Project site. The environmental status of the Specific Plan Area has been fully characterized based on years of analysis under the oversight of multiple regulatory agencies, including United States Environmental Protection Agency, the Department of Toxic Substances Control, and the Regional Water Quality Control Board, in addition to numerous studies prepared in connection with the Project itself, including a Phase I Environmental Site Assessment (ESA) and Phase II ESA. The Phase I ESA assesses whether soil or other additional testing is necessary to characterize the extent, if any, of contamination on the Specific Plan Area. The Phase I ESA may not include constituents of concern (COCs) that have been fully investigated and/or remediated on the Specific Plan Area already. The Phase II ESA sampling was conducted as a result of the

recommendations in the Phase I ESA. The Phase II ESA found that all constituents of concern in soil samples collected during the Phase II ESA were below commercial/industrial screening levels.

As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, additional research confirms that all COCs in soil samples collected during the Phase II ESA are also below construction worker and residential screening levels. The Phase I determined the depths at which COCs could be encountered and the Phase II sampled to those depths. Given that all COCs in soil in the Phase II ESA are below the most conservative residential and construction worker standards, rather than only the required commercial/industrial standards, there is no indication that any COCs would be encountered below those depths. As confirmed in Recirculated Section 4.8, Hazards and Hazardous Materials, the environmental soil sampling was completed "in the locations, and to the depths, judged appropriate based on the potential concern for the former Ordnance Storage Facility/Weapons Storage Area activities to have caused a potential impact to shallow soils. Historical research indicates these former activities occurred at the existing site grade. There is no indication of former activities/features likely to have caused a release (of the chemicals of concern for which analyses were completed) that originated well below the existing ground surface (such as deeply buried tanks or pipelines, etc.). Leighton completed various environmental soil sampling trenches to five feet deep below ground surface (bgs), as well as environmental sampling borings to approximately 25 to 30 feet bgs. … Given the known site conditions, and future planned site usage, the depth of environmental investigations were appropriate." As such, no further sampling or analysis is required. Please refer to Recirculated Section 4.8, Hazards and Hazardous Materials, for further discussion of the Specific Plan Area's environmental characterization.

I-790.20 This comment questions why sampling for certain substances was not conducted in connection with the Draft EIR and questions how March JPA determined which chemicals to test for and which to omit. The comment also cites a known contaminants list for the March AFB provided by EPA. This list refers to the entire March AFB, of which the Specific Plan Area is only a portion. The soil on the remainder of the Project site, such as the 445.43 acres under the Conservation Easement, will not be disturbed in connection with the Project. As noted above, a Phase I ESA was prepared for the Specific Plan Area. The Phase I ESA assesses whether soil or other additional testing is necessary to characterize the extent, if any, of contamination on the Specific Plan Area *based on previous activities on the Specific Plan Area*. The Phase I ESA may not include constituents of concern (COCs) that have been fully investigated and/or remediated at the Specific Plan Area already, as is the case with the PFAS, one of the "known contaminants" cited by the comment. For a further discussion of PFAS testing at the Specific Plan Area, please refer to Recirculated Section 4.8, Hazards and Hazardous Materials. With respect to perchlorate, there is no information that indicates perchlorate would be present in soil on the Specific Plan Area. As discussed in Recirculated Chapter 3, Project Description, the proposed Project is located in a former munitions storage area, in which munitions (and later fireworks) were stored indoors in secured concrete bunkers. As part of the Phase I, the concrete bunkers were inspected and the environmental professional noted that the "bunkers are constructed entirely of concrete" and that "[n]o evidence of floor pitting or staining was observed in the bunkers, and the concrete flooring was noted to be in excellent condition." As such, there is no pathway for perchlorate to the soil. There is no information to indicate that munitions or fireworks were disposed of in the Specific Plan Area and no indication that fireworks were manufactured on site and, as such, there is no evidence indicating a release of perchlorate to soil. CEQA does not require speculation. *See, e.g. Laurel Heights Improvement Assn. v Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1137. Please refer

to Recirculated Section 4.8, Hazards and Hazardous Materials, for further discussion of environmental characterization of the Specific Plan Area and for a discussion of munitions disposal investigations.

I-790.21 This comment refers to the same EPA Superfund summary website referenced in Comment I-790.20 and notes that the March AFB only meets 3 of the 5 Performance Measures required for site reuse. As noted above, this Superfund listing is for the entire March AFB, of which the Specific Plan Area is only a portion. There are ongoing remedial efforts on other portions of the March AFB, none of which are located in the Specific Plan Area and none of which will be impacted by the Project. As indicated by the EPA under the "Construction Complete" Performance Measure, "**Yes** means the physical construction of the cleanup is complete for the **entire site**" [emphasis in original]. Because there are still remedial activities in process on portions of the March AFB, the physical construction of the cleanup is not complete for the entire site (which, as noted above, includes areas outside of the Specific Plan Area). The last Performance Measure, "Sitewide Ready for Anticipated Use," also applies to the entire site and, as explained by the EPA therein, "a site listed as **no** may still have redevelopment occurring on portions of the site and additional redevelopment may be possible." In addition, the performance measure for "Human Exposure Under Control" is "Yes" which means "assessments indicate that across the entire site: (1) There are currently no unacceptable human exposure pathways; and (2) EPA has determined the site is under control for human exposure." As explained above and in Recirculated Section 4.8, Hazards and Hazardous Materials, the environmental status of the Specific Plan Area has been fully characterized and there are no COCs present in the Specific Plan Area that present a risk to future users of the Project or nearby residents.

I-790.22 The majority of this comment is the same as the fourth paragraph of Form Letter D – Hazards, but includes the addition of "the contaminants identified on the EPA contaminant list for the site" to the list of additional sampling requests. With respect to this item, please refer to Response I-790.20 above. In response to the remainder of this comment, please see Form Letter D Response.

I-790.23 This comment is the same as Comment FL-D.12 in Form Letter D. As such, in response to this comment, please see Form Letter D Response.

I-790.24 This comment is the same as the last two paragraphs of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

I-790.25 This comment refers to SB 1000 and indicates that "local jurisdictions need to identify environmentally disadvantaged communities in their regions and address environmental justice" but that neither the General Plan for March JPA nor the Draft EIR include an environmental justice section. The powers and duties of the Office of Planning and Research include coordinating environmental justice programs and, as referenced in the comment, defines "'environmental justice" as "the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." California Government Code, Section 65040.12(e)(1). Environmental justice includes: the availability of a healthy environment for all people; the deterrence, reduction, and elimination of pollution burdens for populations and communities experiencing the adverse effects of that pollution, so that the effects of the pollution are not disproportionately borne by those populations and communities; governmental entities engaging and providing technical assistance to populations and communities most impacted by pollution to promote their meaningful participation in all phases of the environmental and land use decision making process; and at a minimum, the meaningful consideration

of recommendations from populations and communities most impacted by pollution into environmental and land use decisions. California Government Code, Section 65040.12(e)(2).

However, "environmental justice" is not a term used anywhere in CEQA and is not an issue area identified in CEQA for analysis in an EIR. As explained in Recirculated Chapter 2, Introduction, the purpose of the EIR is to evaluate and disclose the potential environmental consequences of the proposed Project, which does include the deterrence, reduction, and elimination of environmental impacts on all people, including communities experiencing the adverse effects of pollution. The EIR describes the applicable requirements and purposes of CEQA, including to inform governmental decisionmakers and the public, including the meaningful participation in all phases of the environmental and land use decision making process. The EIR discloses the potential significant environmental effects of proposed activities; identifies the ways that environmental damage can be avoided or significantly reduced; prevents significant and unavoidable damage to the environment by requiring changes in the project through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and discloses to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved. The EIR includes analysis of the Project's potential cumulative environmental effects, and the cumulative effects analysis methodology is explained in Chapter 4.0, Environmental Analysis, of the Draft EIR. See also Topical Response 7 – Cumulative Projects for further cumulative impacts discussion. Thus, the EIR complies with CEQA and the environmental impacts of the proposed Project are fully considered, including the impacts on populations listed in the Government Code related to environmental justice.

As discussed in Recirculated Chapter 3, Project Description, Senate Bill 1000 (Government Code Section 65302[h]) requires jurisdictions to adopt an environmental justice element if the jurisdiction includes a disadvantaged community and two elements of the jurisdiction's General Plan are proposed for amendment. The March JPA Planning Area is within a disadvantaged community (Census Tract 6065046700) as identified by CalEnviroScreen 4.0. March JPA will need to adopt an Environmental Justice Element for its General Plan to address this requirement prior to considering approval of the Project.

In November 2023, March JPA released a Draft Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a) (March JPA 2023). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement.

I-790.26 This comment provides existing conditions information from CalEnviroScreen about two census tracts, one of which includes the Project site. CalEPA's Office of Environmental Health Hazard Assessment (OEHHA) developed the California Communities Environmental Health Screening Tool (CalEnviroScreen), which provides statewide data that can be used to identify communities disproportionately burdened by multiple sources of pollution.[4] The CalEnviroScreen model includes two components representing pollution burden (exposures and environmental effects) and two

[4] https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40

components representing population characteristics (sensitive populations and socioeconomic factors).[5] An overall pollution burden score is calculated by CalEnviroScreen based on indicators related to exposures (i.e., ozone concentrations, $PM_{2.5}$ concentrations, diesel particulate matter emissions, drinking water contaminants, etc.) and environmental effects (e.g., cleanup sites, groundwater threats, hazardous waste, etc.). As noted in the comment, the census tract that includes the Project site has a high overall pollution burden score. The Project's census tract is large and includes all of the March ARB and the March JPA jurisdiction along with three blocks within the City of Moreno Valley, which appear to have been mapped as part of March JPA. Residential uses within the Project's census tract are limited to the Westmont Village retirement community off of Village West Drive, which was originally developed for retired military housing, Green Acres, which consists of 111 homes as part of the March Field Historic District, the US Veterans transitional housing facility, and the residential block surrounding the Cottonwood Golf Center, and a few scattered residences in blocks of Moreno Valley included in the census tract. These residential uses within the March ARB census tract are located approximately two miles from the Project site, the residents in the retirement community are to the south of Van Buren Boulevard and the residents in Moreno Valley are to the east on the opposite side of the 215 Freeway. These residences are also located outside the area where the Project's truck route will emit TACs as evaluated in the Project Health Risk Assessment (See Recirculated Section 4.2, Air Quality). The other census tract referenced in the comment, census tract 6065042505, is located to the north of the census tract that includes the Project site, on the opposite side of the 215 Freeway north of the March ARB, even further from the Project site. As such, the proposed Project is not proximate to these residences such that it will increase their pollution burden.

The census tracts adjacent to the Project site (6065042012, 6065042014, and 6065042013), which include the Mission Grove neighborhood, the residences located in Riverside County to the north of the Project site, and the Orangecrest neighborhood south of the Project site, are not identified as disadvantaged or overburdened with pollution.

This comment provides information but does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-790.27 This comment references March JPA General Plan Goal 2, Policy 2.4 to "protect… adjacent residents" and asserts that March JPA "should reject upzoning the West Campus Upper Plateau to allow for industrial uses given the heavy industrial uses that already surround these communities" and notes that the communities "cannot afford further degradation of their air quality and quality of life." As noted above, the proposed Project is not proximate to the residences in the two referenced census tracts such that it will increase their pollution burden. As further noted above, the census tracts that *are* adjacent to the Project site are not identified as disadvantage or overburdened with pollution. The comment further asks for transparency with respect to how the Project will affect "these already environmentally vulnerable communities" and asks that the Final EIR include an environmental justice section. Please refer to Responses I-790.25 and I-790.26 above.

I-790.28 This comment is general in nature about the adequacy of the jobs numbers. In response to this comment, please see Topical Response 5 – Jobs.

[5] https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf

I-790.29 This comment states that there are not enough unemployed people in the local area to fill the number of jobs that the logistics industry claims they are creating. In response to this comment, please see Topical Response 5 – Jobs.

I-790.30 This comment states that the majority of warehouse jobs are low-wage and temporary work with reduced hours, and workers could not afford to live in the local area. The comment, however, does not raise any issues about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided. Please refer to Topical Response 5 – Jobs for a further discussion of job creation and fulfillment.

I-790.31 This comment questions the impacts of the logistics industry for the economic outlook of the region. Pursuant to CEQA Guidelines 15131, "[e]conomic or social effects of a project shall not be treated as significant effects on the environment." The Guidelines further explain that, among other things, under CEQA, economic effects are relevant only insofar as they may serve as a link in a chain of cause and effect that may connect the proposed project with a physical environmental effect, or they may be part of the factors considered in determining the significance of a physical environmental effect. This comment does not raise any issues about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-790.32 This comment questions the ownership locale of companies who own and operate warehouses in the Inland Empire. Company ownership falls outside the scope of the environmental analysis required for the proposed Project. This comment does not raise any issues about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-790.33 This comment states that industrial is the worst land use possible for generation of jobs. This comment is outside the scope of the environmental analysis required for the proposed Project. This comment does not raise any issues about the adequacy of the environmental analysis included in the Draft EIR. However, in response to this comment, please see Topical Response 5 – Jobs for an explanation for how the number of jobs anticipated from the proposed Project was calculated.

I-790.34 This comment raises concerns regarding future automation. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. This comment does not raise any issues about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-790.35 This comment provides general opposition to the Project and its potential job creation. These comments do not raise any issues about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided. However, for further discussion of the jobs projections and related information for the Project, please see Topical Response 5 – Jobs.

I-790-36 This comment repeats assertions that there are not enough workers in the area to fill new jobs created by the Project and that the wages paid by the jobs created would be too low for area residents. For responses to these comments, please refer to Responses I-790.29 and I-790.30 above. The comment alleges that the VMT estimates for the Project are inaccurate and asks for justification for the assertion that commutes will decrease from 21 miles to 16 miles. As explained in the Urban Crossroads AQ/GHG Responses to Comments (Appendix C-3), for passenger vehicles, the historic CalEEMod default for the

trip length is approximately 16.6 miles – however for analytical purposes, the CalEEMod 2022 model defaults were utilized which identify a weighted average of approximately 20 miles. Therefore, the traffic model did not assume 21-mile commutes would be shortened to 16 miles.

I-790.37 The comment states that there are not enough local people to fill the new employment positions associated with the proposed Project. In response to this, please see Topical Response 5 – Jobs. The comment also raises the fact that local cities in the vicinity are not in compliance with meeting state-mandated goals for the provision of housing. The Project site's local vicinity is planning to experience housing growth as facilitated by local jurisdictions' Housing Element updates and the Regional Housing Needs Allocation (RHNA). Section 4.12, Population and Housing, of the Draft EIR describes RHNA as mandated by State Housing Element Law as part of a periodic process of updating local housing elements in city and county general plans. The RHNA is produced by SCAG and contains a forecast of housing needs within each jurisdiction within the SCAG region for eight-year periods. The RHNA provides an allocation of the existing and future housing needs by jurisdiction that represents the jurisdiction's fair share allocation of the projected regional population growth. Table 4.12-2, SCAG's 6th Cycle Final RHNA Allocation, details the housing goals for each of March JPA's member jurisdictions: unincorporated Riverside County (40,647 units), City of Riverside (18,458 units), City of Perris (7,805 units), and City of Moreno Valley (13,627 units). Therefore, a total of 80,537 housing units are planned for 2029 within the Project site's vicinity. Given this, the Project's introduction of new jobs within the local vicinity would support future population and housing growth anticipated over the next 6 years.

The comment asserts that the Draft EIR needs to assess the RHNA goals for each member agency of March JPA. As detailed in the Draft EIR, the 6th Cycle RHNA has been underway since October 2021. The planning period ends in October 2029. The EIR notes the housing goals for each member jurisdiction to supplement the analysis of future housing growth. However, the progress of meeting these housing goals by 2029 is too speculative at the time of drafting this Final EIR. As detailed in Topical Response 5 – Jobs, it is reasonable to assume the jobs generated by the Project could be filled with existing local residents residing within the County, either from the unemployed population or residents looking to reduce their commutes. The comment does not raise any specific environmental issues, questions or concerns related to the adequacy of the environmental analysis within the Draft EIR.

I-790.38 This comment is similar to Form Letter G – Traffic Comment FL-G-4, expressing concerns about the traffic relative to the 215 Freeway and 60 interchange, cumulative projects, and Caltrans review of the Project. In response to this comment, please see Form Letter G Response FL-G-4.

I-790.39 This comment expresses concerns about traffic on arterial streets, including Alessandro and Van Buren, and trucks not following the enforcement codes, and questions what enforcement mechanisms will be used to mitigate traffic. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Under PDF-TRA-1, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial

phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-790.40 This comment asserts that trucks damage roads and highways 2,500 times more than cars and requests that the Final EIR factor these details into the maintenance costs for local roads and highways. Roadways that handle truck traffic are typically designed with additional structural support to account for number of heavy trucks. With respect to damage to the roadways, commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[6] .

I-790.41 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

I-790-42 This comment is a conclusion to the comment letter and does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR. The comment incorrectly identifies the land use square footages of the Specific Plan buildout scenario. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

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

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From: Josie Sosa <josie.sosa@gmail.com>
Sent: Thursday, March 9, 2023 11:41 AM
To: Dan Fairbanks
Cc: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-791.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-791.1 Cont.

3. Alternate plan #3: The State or County Park Approach
· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Josie Sosa
8770 Mesa Oak Dr.
Riverside Ca 92508
--

Letter I-791

Josie Sosa
March 9, 2023

I-791.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Thursday, March 9, 2023 9:52 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

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For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-792.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
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I-792.1 Cont.

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Thank you for allowing me to provide comments on this project.

Sincerely,
Joseph Aklufi
Riverside, 92506

Joe Aklufi
(951)377-4255

Letter I-792

Joseph Aklufi
March 9, 2023

I-792.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: mkymsecltr <mkymsecltr@aol.com>
Sent: Thursday, March 9, 2023 6:34 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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I-793.1 Cont.

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· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

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Thank you for allowing me to provide comments on this project.

Sincerely,
<Karen Baker 92508

Letter I-793

Karen Baker
March 9, 2023

I-793.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: kaelan barrios <kaelanbarrios@gmail.com>
Sent: Thursday, March 9, 2023 11:04 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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I-794.1
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Thank you for allowing me to provide comments on this project.

Sincerely,
<include name, address, email in signature line>

Letter I-794

Kaelan Barrios
March 9, 2023

I-794.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Carney, Kevin P. <KCarney@socalgas.com>
Sent: Thursday, March 9, 2023 8:30 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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Thank you for preserving our neighborhood as I trust your conscience will not allow you to go through with this. As you know, if these warehouses go in and Barton road is put through into Orangecrest, our neighborhood will deteriorate dramatically, the environment will be further devastated and Riverside will experience a net loss as all the good work being done to revitalize older areas will not be able to offset the nosedive of Orangecrest. I-795.3

Regards,

Kevin Carney

8268 Laurel Ridge Rd, Riverside

Letter I-795

Kevin Carney
March 9, 2023

I-795.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 SF of warehouse use, 528,951 SF of office use, and 160,921 SF of retail use. This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required.

I-795.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

I-795.3 This comment expresses general opposition to the Project and concern regarding the Barton Street extension. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue.

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From: K Doty <dkdoty2@gmail.com>
Sent: Thursday, March 9, 2023 10:31 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
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· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-796.1 Cont.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Kristine Doty
8805 Morninglight Circle
Dkdoty2@gmail.com

Sent from my iPhone

Letter I-796

Kristine Doty
March 9, 2023

I-796.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Kyle Warsinski <kwarsinski@gmail.com>
Sent: Thursday, March 9, 2023 1:36 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The proposed project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside ("The City of Arts and Innovation") and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant calculate this number? Was the concept of automation factored in? It should be known there are companies that have designed and currently selling automated high-pile racking systems that use robitics to move pallets on and off racks at nearly four times the speed of an average employee. Robitic fork lifts are also used in tandem with the previously described system. In fact a company that designed these systems and sells them resides in one of the JPA's member jurisdictions. There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

I-797.1

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. You can clearly see that the labor shortage in the region of people willing to work in these facilities is an issue, which once again underscores the move toward automation across the entire industry. I would suggest reading one of the key researchers in this field, Dr. Johannees Moenius, University of Redlands, or better yet call him to discuss the threat of automation to these industry groups. If you do, it will be clear that any job generation benefits realized today will be eliminated in the near future.

I-797.2

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers. The number of entitled warehouses in correct areas that do not have neighborhoods or sensitive receptors nearby is sufficient for future job growth. There is no rationale that supports warehouse projects being approved near incompatible land uses.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses as I suggest above? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

I-797.3

Sincerely,

Kyle Warsinski
20180 Dayton Street
Riverside, CA 92508
kwarsinski@gmail.com

Letter I-797

Kyle Warsinski
March 9, 2023

I-797.1 This comment is the first half of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

I-797.2 This comment discusses the lack of interest in working in the logistics industry and future automation of the industry. Please see Topical Response 5 – Jobs for a discussion of regional unemployment rates. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

I-797.3 This comment is the second half of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Kyle Warsinski <kwarsinski@gmail.com>
Sent: Thursday, March 9, 2023 1:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside ("The City of Arts and Innovation") and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

I-798.1

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning my lungs and those of my two small children. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028. The report titled "Warehouses, pollution, and social disparities" authored by Torres, Victoria, Klooster, 2021 (https://earthjustice.org/wp-content/uploads/warehouse_research_report_4.15.2021.pdf) shows that asthma rates and cardiovascular disease rates are 5% and 9% higher respectively in areas with warehouses than compared to the state average. Approving projects like these in such close proximity to homes and schools, which contain children and the elderly, should be avoided at all costs. There is no financial benefit to the community or developer that can offset the negative health impacts that have been documented and are readily available for review. The Draft EIRS statement the project will have significant and unavoidable air quality impacts sounds benign, but what it really means is if the project is approved, my children's and my neighbor's children's risk of developing asthma and cardiovascular disease are greatly increased.

I-798.1 Cont.

I-798.2

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I-798.3

Thank you for the opportunity to comment.

Sincerely,

Kyle Warsinski
20180 Dayton Street
Riverside, CA 92508
kwarsinski@gmail.com



WAREHOUSES, POLLUTION, AND SOCIAL DISPARITIES

An analytical view of the logistics industry's impacts on environmental justice communities across Southern California

April 2021

Authored By:

Ivette Torres, Environmental Science Researcher and Analyst and
Anthony Victoria, Communications Advisor
People's Collective for Environmental Justice

Professor Dan Klooster and his Environmental Studies 277 students at the University of Redlands

This report is dedicated to the environmental justice communities of Southern California that continue to fight for clean air and environmental justice

ACKNOWLEDGEMENTS

We would like to express our gratitude to the organizations that provided information, insights, and moral support that made this analysis possible:

The Sierra Club
Earthjustice
People's Collective for Environmental Justice
East Yard Communities for Environmental Justice
Warehouse Workers Resource Center
Partnership for Working Families
Teamsters Local 1932
Inland Congregations United for Change
Adrian Martinez
Yassi Kavezade
Andrea Vidaurre
Taylor Thomas
Michelle Ghafar
Regina Hsu
Carlo De La Cruz
Angie Balderas
Stephanie Torres
Xavina Walbert
Alexis Wilis
Professor Dan Klooster

EXECUTIVE SUMMARY

In collaboration with the University of Redlands, the People's Collective for Environmental Justice (PC4EJ) used a collection of data to analyze the 3,321 warehouses above 100,000 sq.ft that fall in the South Coast Air Basin, which covers Los Angeles, Orange, Riverside, and San Bernardino counties. The regional board responsible for regulating air quality in Southern California—the South Coast Air Quality Management District (SCAQMD)—is considering adopting an Indirect Source Rule for warehouses in an attempt to address the air quality and health impacts associated with the goods movement industry. While warehouses do not produce pollution directly, the mobile sources of pollution they attract (the most notable of these sources being diesel trucks) contribute to the region's high levels of smog and ozone[1] that have consequential impacts on the respiratory health of Southern California's residents.

As the warehouse and logistics industry continues to grow and net exponential profits at record rates,[2] more warehouse projects are being approved and constructed in low-income communities of color and serving as a massive source of pollution by attracting thousands of polluting truck trips daily. Diesel trucks emit dangerous levels of nitrogen oxides and particulate matter that cause devastating health impacts including asthma, chronic obstructive pulmonary disease (COPD), cancer, and premature death. As a result, physicians consider these pollution-burdened areas 'diesel death zones.'[3]

Using data sources from the SCAQMD and the California Office of Environmental Health Hazard Assessment's CalEnviroScreen 3.0 tool, the following data sets were analyzed: warehouse location to a toxic facility (such as gas and oil facilities), warehouse location to e-commerce sales for 2020, warehouse location to schools, warehouse locations to traffic, and warehouse locations to a variety of other demographic variables.

It is important to note that maps with the aforementioned variables were not publicly available or accessible. Until now, no industry, research institution, or agency found it necessary to map warehouse locations with vital correlations to socio-economic demographics. It has been clear to many community members, advocates, and many others in the clean air and environmental

[1] "State of the Air 2020" (American Lung Association), https://www.stateoftheair.org/assets/SOTA-2020.pdf.
[2] "2020 North America Industrial Big Box Review & Outlook," CBRE, https://www.cbre.us/research-and-reports/2020-Industrial-Big-Box-Inland-Empire.
[3] Tony Barboza, "Freeway Pollution Travels Farther than We Thought. Here's How to Protect Yourself," Los Angeles Times (Los Angeles Times, December 30, 2017), https://www.latimes.com/local/california/la-me-freeway-pollution-what-you-can-do-20171230-htmlstory.html.

justice movement that the growth of the logistics industry in Southern California correlates with health, economic, and racial disparities.

These maps will serve to demonstrate the severity of our region's air pollution woes and raise urgency for important policies such as the Indirect Source Rule, the Advanced Clean Fleet rule, and other air quality management and community emissions reduction plans that will work to clean our air, create sustainable freight and goods movement, and protect public health.

Warehouse Locations and Proximity to Toxic Facilities

Warehouse facilities in Southern California are approved in communities already experiencing pollution burdens from toxic facilities, such as oil and gas refineries and power plants.

Through existing data, we found that the top 10 communities in the South Coast Basin with the most warehouses also fall in the highest percentiles of toxic facilities.

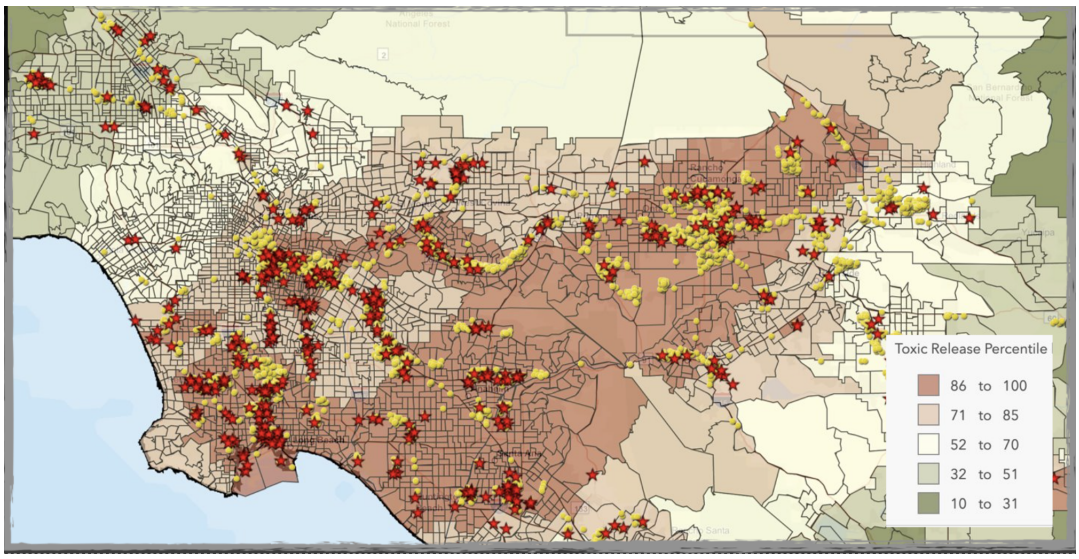


Figure 1: *In the following map an overlay of warehouse locations in yellow points and toxic facilities in red stars is seen. As well as the different shaded areas of the percentiles for toxic releases. Source: University of Redlands.*

- **The Carson/Wilmington** area that has the 7th highest amount of warehouses (126 warehouses total) falls in the toxic percentile of 92.89, meaning it is higher than 92.89% of the census tracts in California. Toxic releases in this area include railroad operations and refineries.
- **The Ontario** area, which has the highest concentration of warehouses (289 warehouses), falls in the toxic percentile of 97.26, meaning it is higher than 97.26% of the census tracts in California. Toxic releases in this area include the Cal Portland Cement plant, tool and die shops, and a multitude of interstate freeways.
- **The City of Industry** area that has the 2nd highest concentration of warehouses (197 warehouses) falls in the toxic percentile of 98.28, meaning it is higher than 98.28% of the census tracts in California. Toxic releases in this area include

chemical manufacturers, Union Pacific Railroad operations, and other processing plants such as metal manufacturers.

- **The Anaheim** area that falls as the 14th highest in warehouses (75 warehouses) falls in the toxic percentile of 95.55, meaning it is higher than 95.55% of the census tracts in California. Toxic releases in this area include the cement and gas plants.
- **The Los Angeles/ Vernon** area that falls as the 3rd highest in warehouses (262 warehouses total) falls in the toxic percentile of 97.57, meaning it is higher than 97.57% of the census tracts in California. Toxic releases in this area include lacquer companies and other contaminated areas such as lead, metal, and chemical manufacturers.

Warehouse Locations and Proximity to Schools

There are 640 schools in the South Coast Air Basin within ½ mile radius of a warehouse. Land use and zoning ordinance changes approved through local municipal and county governments have resulted in warehouses being constructed in already pollution and economically burdened areas.

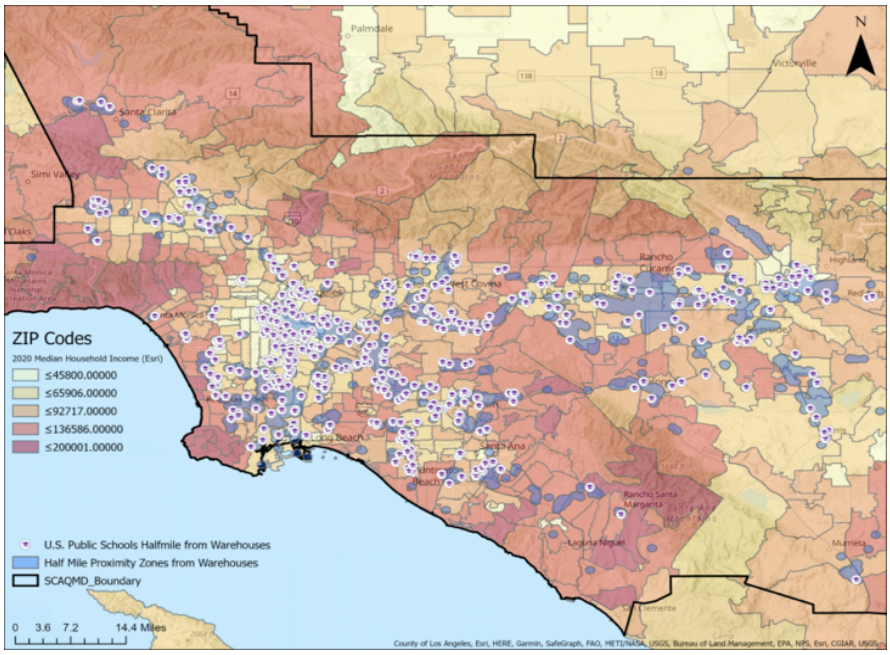


Figure 2: *In the following map you can see warehouse zones be highlighted as blue circles and schools as purple/white dots. The warehouse and school data is also overlaid with household income data. Source: University of Redlands.*

As seen in Figure 2 and Table 2, historically warehouses have been developed within .5 of a mile, if not closer, of educational institutions. Unfortunately, we see this trend growing, as warehouse developments continue to encroach on these sensitive receptors.

Comparative Statistics for Schools

Area	Variable
Entire SCAQMD	3,712 Schools $74,237 2020 Med HH Income
State of California	10,442 Schools $77,500 2020 Med HH Income
0.5 miles from a warehouse	640 Schools $60,218 Med HH Income
0.5 miles from a warehouse in a disadvantaged zone	473 Schools
0.5 miles from a warehouse in a disadvantage zone that contains at least one warehouse	242 Schools

Table 2: Comparative Statistics for schools in the South Coast Air Quality Management District ½ of a warehouse
Public Source: CDE-Data-CA, SCAQMD, CALENVIRO OEHHA

The most blaring and unfortunate example is the unincorporated community of Bloomington in San Bernardino County, which is seeing an upward trend in warehouse development near homes and schools. In fact, as of publication time for this report, Bloomington community leaders are leading an ongoing organizing effort to oppose a proposed 3 million square foot warehouse development plan located directly adjacent to several schools. If approved, the Bloomington Business Park Specific Plan will demolish 213 homes to make way for a warehousing district in an area already impacted by millions of square feet of warehouse development. Figure 2.1 contextualizes how much space of housing would become logistics near three Colton Joint Unified School District locations.

Six of the eight schools in the Bloomington community sit, or will sit, right next to a warehouse.

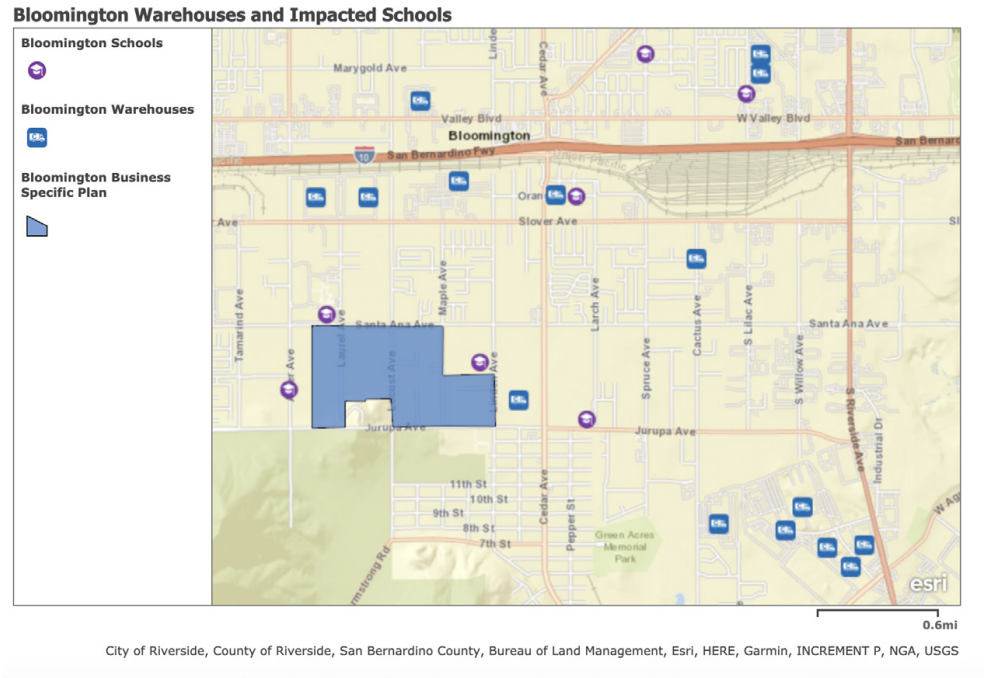


Figure 2.1 : The following map is of the community of Bloomington in San Bernardino County, with warehouses over 100000 sq ft already present mapped and schools in the community mapped, as well as a proposed project. Source: Torres, I.

It is why communities recommend that any policy that advances the deployment and investment in zero-emissions technology (e.g. electric trucks, yard hauslers, and forklifts) take place in disadvantaged communities first.

Amazon's influence on the Inland Empire

Amazon has made record profits in the last decade, and it has come largely at the cost of communities in the Inland Empire that have seen several large fulfillment centers built near their backyards. Worse, we see a huge disconnect on warehouse locations to e-commerce sales, meaning the communities who order the least online experience the direct pollution and health impacts of the industry by living close or right next to large facilities.

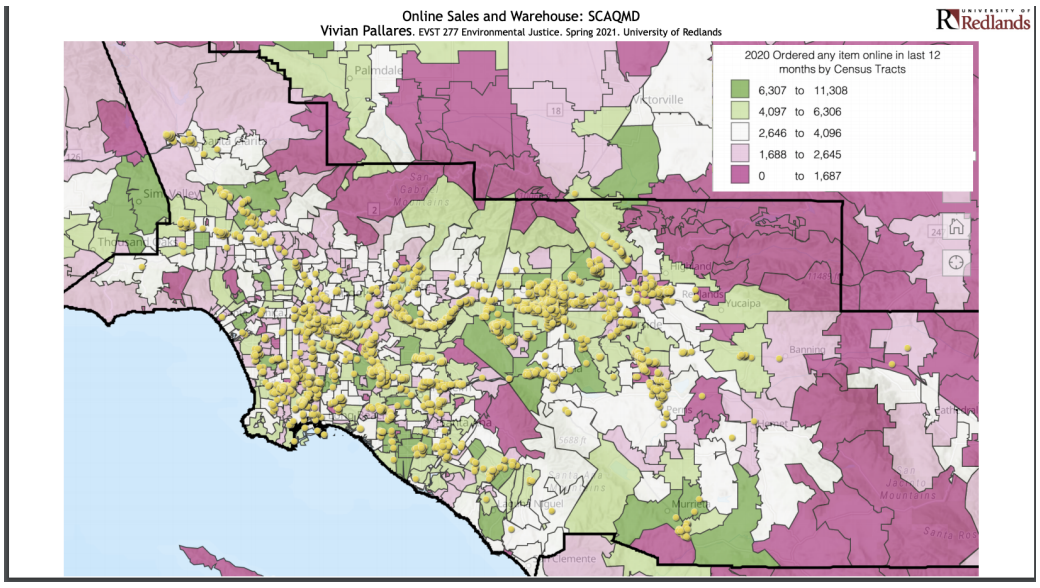
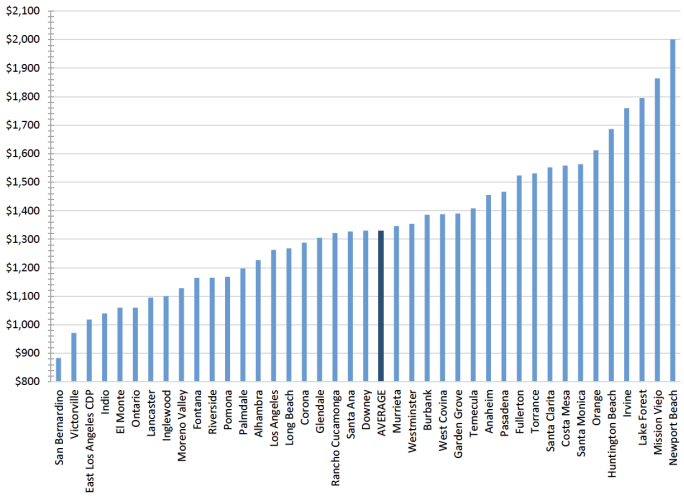


Figure 3: *The trends analyzed are e-commerce sales of 2020 per household by census tracts on scale from least (dark pink) to most ordered (dark green) overlapped by warehouse locations. Source: University of Redlands*

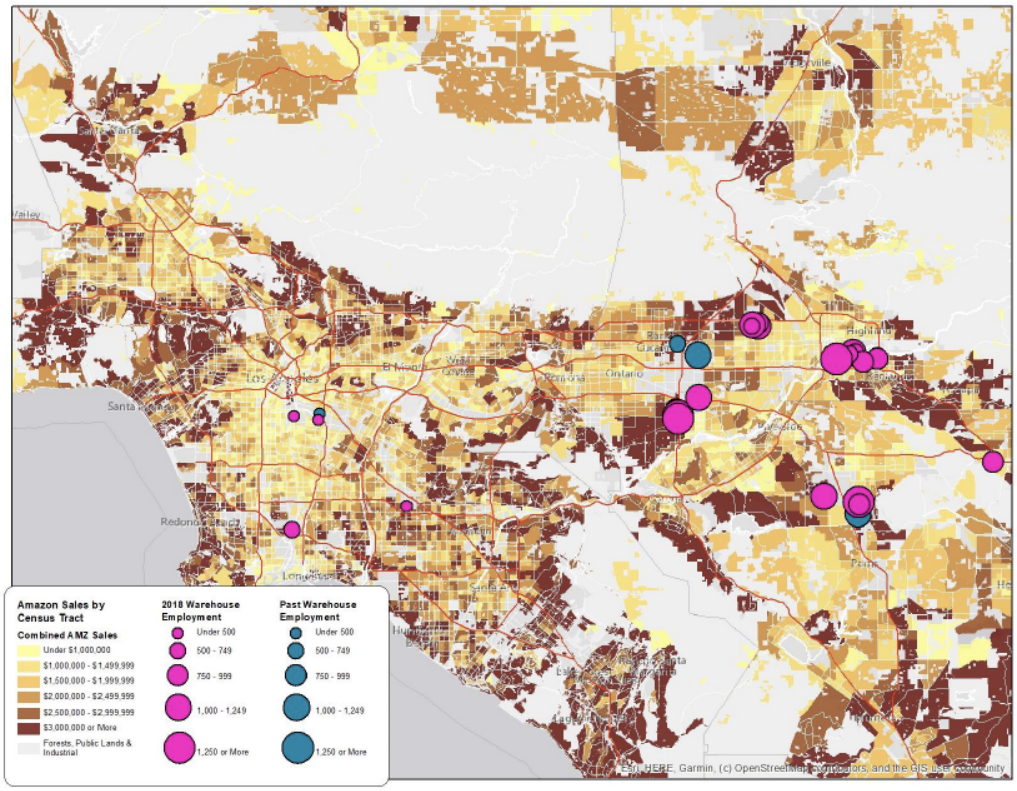
Figure 2: Estimated Amazon Sales per Household in the 40 Largest Cities in the Los Angeles Metropolitan Area



Source: Derived from U.S. Census Bureau American Community Survey 2013-2017 household income data, U.S. Bureau of Labor Statistics Household Consumption breakout of household consumption by item and income level, and Amazon e-commerce sales in the U.S. in 2018.

Figure 3.1: *Estimated Amazon Sales per household. Source: Too Big to Govern.*

Figure 6: Amazon Warehouses in the Four-County Study Area



Source: Public records of Amazon facilities, using the ratio of square feet of warehouse space to employment from city environmental impact reports.

Figure 3.2: *The map plots census tract data from 2013-2017 of Amazon sales per household and overlays it with warehouse locations and their employment rates. Source: Too Big to Govern.*

The Economic Roundtable's "Too Big to Govern" report directly looked at Amazon online sales parallel to warehouse locations from 2013-2017.[4] A parallel map to our 2020 map of e-commerce sales is the one above from the Economic Roundtable report that analyzed Amazon sales by census tracts. In the Economic Roundtable report, the census tracts with a warehouse or Amazon facility nearby spend the least online compared to the coastal, more affluent communities with higher online shopping rates that have no Amazon or other online retail warehouse facilities nearby. We see the pattern remains the same from 2013 to 2020, where sales online are higher in non-goods movement communities and extremely lower in goods movement communities with warehouses present.

University of Redlands student researcher Vivian Pallares shares the following based on the data she helped gather:

[4] https://economicrt.org/publication/too-big-to-govern/

> **"The majority of warehouses in Southern California are placed in the areas that online shopping is done the least.** This is important to investigate because it shows how the communities that are the most impacted by warehouses and their pollution are not the communities that are consuming the products. **The neighborhoods in green are free riders of pollution in this case because they are able to enjoy the benefits and convenience of online shopping and shipping without having to be in close proximity to warehouses. Those who are closest to the warehouses suffer the consequences of having pollution from warehouses and transportation in their neighborhoods and this can have a negative impact on their health at a disproportionate rate from the other communities."**

Amazon touts being strong on climate, but actions demonstrate that that they are in fact doing the opposite by continuing to build warehouses near communities of color without considering existing cumulative impacts. In addition, despite making commitments to take strong action on the climate crisis, Amazon has turned to outdated and harmful technologies that will worsen, not improve our climate. Recently, Amazon applies and received public funding through the SCAQMD to support the company's purchase of 100 natural-gas Class 8 trucks and only 10 zero-emission trucks.[5] Natural gas developments will ultimately hurt communities in the long term.

Warehouse locations and truck traffic impacts

The average percentile for traffic across census tracts with warehouses is 67% compared to the state average of 50%. While California has the strictest auto emissions standards in the U.S., our state is also known for its high number of large freeways and heavy vehicle traffic. Traffic is a significant source of air pollution, particularly in urban areas, **where more than 50% of particulate emissions come from traffic. Specifically, diesel and gas truck emissions—the main source of pollution warehouses attract—**contains a large number of toxic chemicals, including nitrogen oxides, particulates, carbon monoxide, and benzene.

In recent years, communities across the South Coast Air Basin have conducted truck counts to demonstrate the magnitude of the truck pollution issue. For example, residents held a truck count in early 2020 near the 60 freeway in Jurupa Valley and found that approximately 1,161 trucks pass through the corridor per hour.

[5] http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-Apr2-009.pdf?sfvrsn=6

It is important to note that the traffic data also revealed 465 (16%) of warehouses fall in the top 10% worst census tracts for traffic (90-100%)

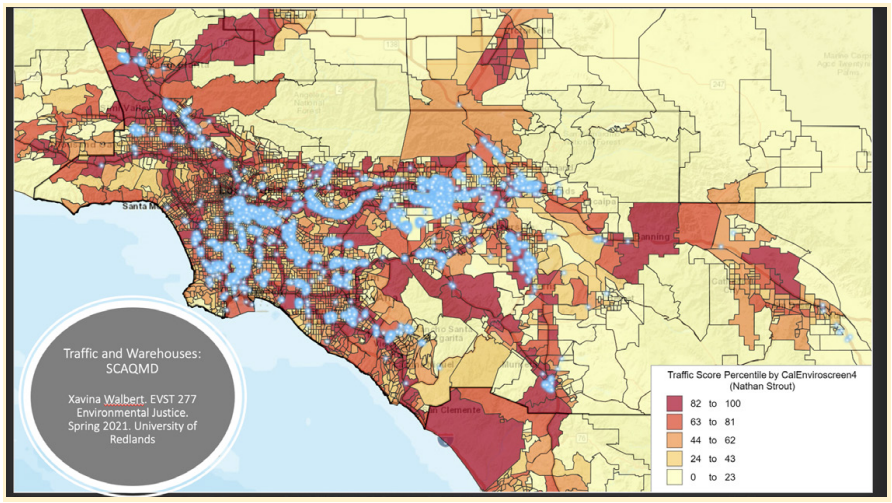


Figure 4: *Warehouse locations (blue dots) mapped with traffic score percentiles. Source: University of Redlands.*

- The overwhelming impacts of truck traffic activity related to the logistics industry is very much known in the South Coast; the unaccounted costs, however, are not.
- People who live within 1,500 feet of a highway are the most heavily exposed to air pollution from traffic, including from dirty diesel trucks, and are therefore the most harmed by diesel truck air pollution.[6]
- Asthma rates and cancer risk are drastically elevated in areas close to ports, warehouse distribution centers and other freight corridors that bring residents in contact with pollution from heavy-duty vehicles.
- A case study of truck traffic impacts in the South Coast is the community of Long Beach and the I-710 expansion.
    - Due to the overwhelming volume of cargo being moved from the ports of Los Angeles and Long Beach to logistics and warehouse facilities more inland through I-710 through diesel and gas trucks, city planners and leaders voted to expand the freeway to accommodate industry at the expense of the community. The freeway expansion will likely displace community residents and longtime community-ran businesses. Advocates are calling on Metro and CalTrans to make amendments to their expansion plans to include no displacement as well as local hiring and zero-emissions policies.

[6] "Public Comment by American Lung Association," Regulations.gov (U.S. Environmental Protection Agency), accessed April 6, 2021, https://www.regulations.gov/document/EPA-HQ-OAR-2014-0827-4846.

Warehouse locations and socioeconomic impacts

Warehouses are more likely to be located in neighborhoods with lower median household incomes and higher levels of poverty. Specifically, as distances between warehouses and residential neighborhoods shorten, poverty rates increase, and so do minority populations, and many other socio-economic demographics: linguistic isolation, asthma rates, housing inequality, cardiovascular rates, and unemployment rates.

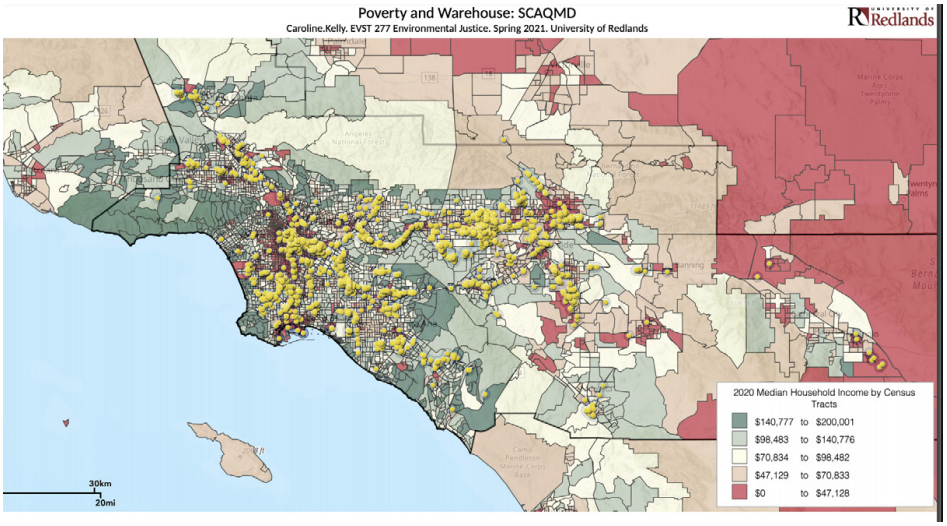
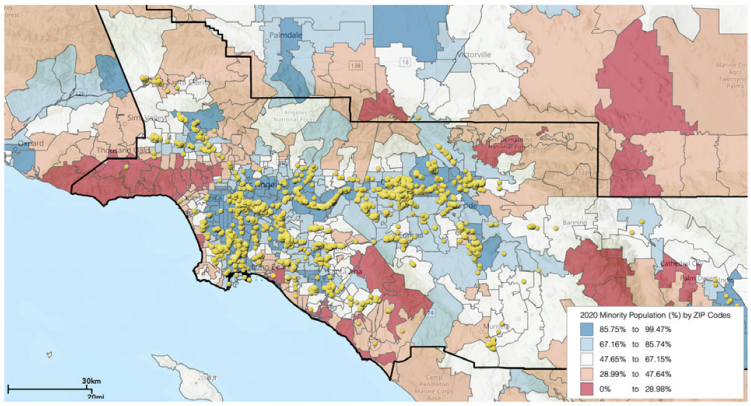


Figure 5: *Looking at the following map warehouse locations (yellow dots) are overlapped with 2020 median household income by census tract. Source: University of Redlands*

Researcher Quan Yuan points out in his research on warehousing locations in environmental justice communities that warehouses are disproportionately and deliberately built in low-income communities of color. Figure 5 confirms Yuan's academic assertions countering industry arguments that these populations move into these areas for job opportunities.[7]

[7]https://reader.elsevier.com/reader/sd/pii/S0264837717309134?token=2039D46FD4D4B3EDCD57FAADE043AD4FBDD418E81792034AAB1B2CBECCBDEB25529A0A3961C20521840A91358BBCA20E&originRegion=us-east-1&originCreation=20210405212514



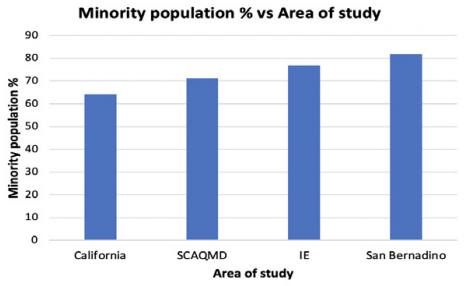
Minority Population % and Warehouses: SCAQMD

Figure 5.1: *Warehouse locations (yellow dots) are overlaid with 2020 minority population (%) by zip codes. Source: University of Redlands*

As we look at **Figure 5.1,** we again see a similar pattern seen earlier: **the closer we get to warehouses in distance, the more communities of color we see. This unfortunately is not the only socio-economic demographic that sees this trend.**

Area	Minority population %
California	64.19%
SCAQMD	71.20%
IE	76.90%
San Bernardino	81.91%

IE distance from warehouse	Minority Population %
1 mile	82.49%
½ mile	84.88%
¼ mile	85.72%



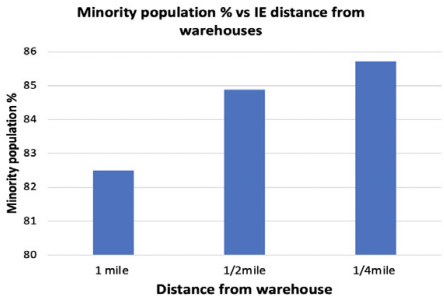


Figure 5.2: *Comparative Statistics of Minority Population (%). Source: University of Redlands*

As Figure 5.2 demonstrates, the closer in distance a household is to a warehouse, the more probable it is for the home to belong to a person of a minority group. This further raises the point that warehouses and the mobile sources of pollution they attract disproportionately impact communities of color more than to their white counterparts.

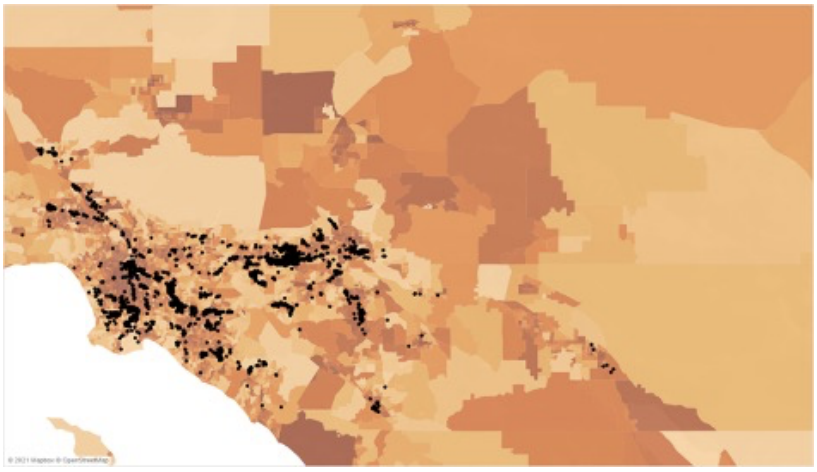


Figure 5.3: *Housing Burdened Low Income Households are looked at by warehouses (black dots) overlaid with housing needs. Source: Sierra Club My Generation.*

Figure 5.3 compares housing needs with warehouse locations. We found that the average percentile for housing burden across warehouses is 61% compared to the state average of 50%; 206 (7%) of warehouses fall in census tracts with the top 10% of housing burdened low income households (90-100%). This claim was also proven true by Quan's research and his other studies on warehouse locations: "In spite of the limitations, the study explicitly points out that the disproportionate siting of warehouses, rather than the housing market dynamics, is the dominant causal factor of the environmental justice problem in warehousing location." [8]

The following figures further emphasize the relationship between warehouses and socio-economic demographics.

[8] Ibid

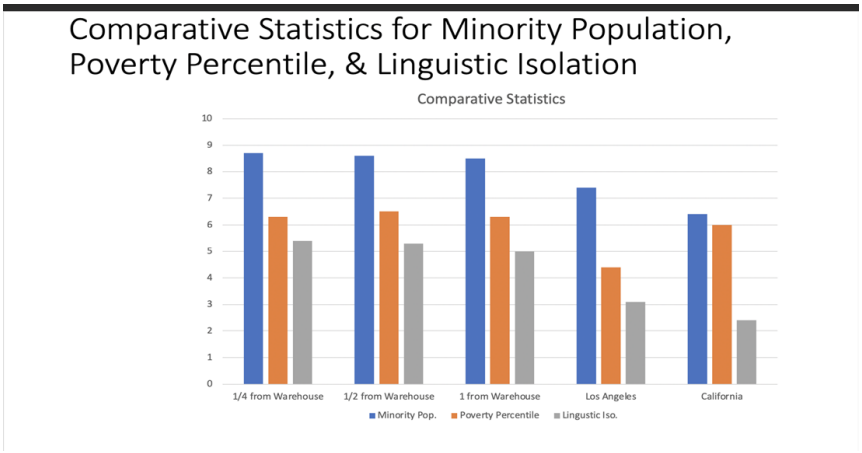


Figure 5.4: *Comparative statistics of previous mapped data of minority and poverty, with and include variable of linguistic isolation. Source: University of Redlands.*

Figure 5.4 compares two demographic variables we are familiar with, poverty and population. There is one important variable to consider: linguistic isolation. Linguistic isolation serves as a large obstacle for residents of color that use English as a second language. If a truck is idling or a new project is being proposed, community members may not be able to voice their concerns if adequate translation is not provided by local, regional, and state regulatory agencies to have translated resources. By providing proper translation local agencies will improve their oversight, and overall, air quality and community health by doing the utmost possible to address concerns around pollution from warehouses.

Asthma

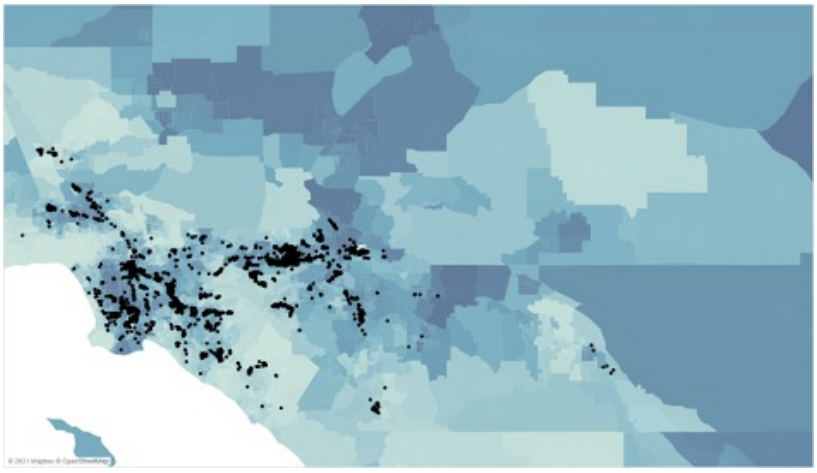


Figure 5.5: *Asthma and respiratory impacts are looked at by warehouses (black dots) overlaid with age adjusted rate of emergency department visits for asthma.Source: Sierra Club My Generation.*

Figure 5.5 reveals that the average percentile for Asthma rates across warehouses is 55% compared to the state average of 50% and 262 (9%) of warehouses fall in the worst 10% of asthma rates across all census tracts (90-100%).

Cardiovascular

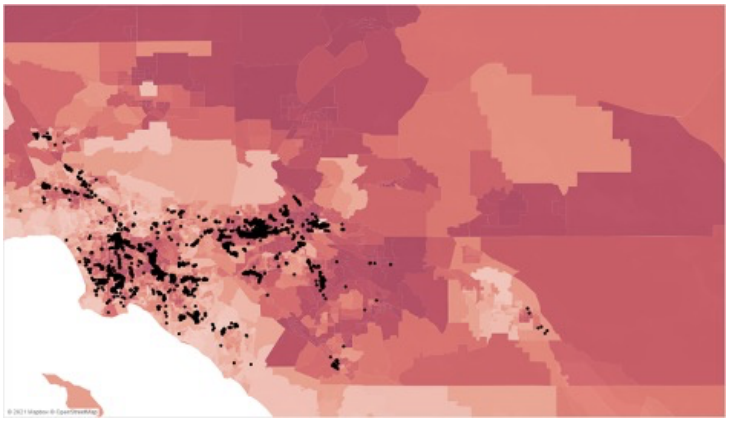


Figure 5.6: *Cardiovascular impacts are looked at by warehouses (black dots) being overlaid with cardiovascular percentiles.Source: Sierra Club My Generation.*

In figure 5.6, we see the average percentile for cardiovascular disease across warehouses is 59% compared to the state average of 50% and 436 (15%) of warehouses fall in census tracts with the top 10% of cardiovascular disease percentiles (90-100%).

Unemployment Rates



Figure 5.7: *Unemployment impacts are looked at by warehouses (black dots) being overlaid with unemployment percentiles. Source:Sierra Club*

Because low socioeconomic status often goes hand-in-hand with high unemployment, the rate of unemployment is a factor commonly used in describing disadvantaged communities. On an individual level, unemployment is a source of stress, which is implicated in poor health reported by residents of such communities. Lack of employment and resulting low income often oblige people to live in neighborhoods with higher levels of pollution and environmental degradation.

- In **figure 5.7 we see the average percentile for unemployment across warehouses is 58% compared to the state average of 50%** and 66 (2%) of warehouses fall in the top 10% worst census tracts for unemployment (90-100%)

CONCLUSION

It is clear from our collected data that building large warehouses with no consideration for public health will continue to diminish the quality of life for low-income communities of color. The prevalence of warehouses and goods movement facilities in low-income, communities of color is a textbook example of environmental racism.

As environmental justice advocates, clean air champions, and more importantly, as members of the community, we are presenting this data to make an urgent call to the South Coast Air Quality Management District to adopt a strong Indirect Source Rule for warehouses that brings 100% zero-emission technology to frontline communities of color that have the right to clean air and deserve environmental and racial justice.

METHODOLOGY

The research and data analyzed in the report was all public sourced. The sources varied from the SCAQMD, the California Office of Environmental Health Hazard Assessment's CalEnviroScreen 3.0 tool, California Department of Education, previous research reports from the Economic Round Table, and research by Quan Yuan.

In order to map the open sourced data ArcGIS Online Community Analyst was used by the researchers and student researchers of the University of Redlands. Added sourced maps were also created from ArcGIS Online/Pro. Other figures referred to the Research report "Too Big to Govern" by Daniel Flaming and Patrick Burns.

Of the 3,321 warehouses that were analyzed in the South Coast Basin only 2870 (86%) had available census tract data through Census Geocode API.

The following figure summarizes the top 20 cities that would be most impacted by South Coast AQMD's proposed Rule 2035 aka Warehouse Indirect Sources Rule.

Table 1: Cities with large warehouse concentrations above 100,000 sq ft in the South Coast Basin that will have to comply with ISR. Source: Torres,I

Top 20 Cities with Large Warehouse Concentrations

Number of Warehouses	CITY	NOTES
289.00	Ontario	San Bernardino County and still expanding in warehouse development
197.00	City of Industry	Los Angeles County and surrounded by many other toxic facilities
168.00	Los Angeles	Los Angeles County and surrounded by many other toxic facilities
140.00	Fontana	San Bernardino County and still expanding in warehouse development
126.00	Santa Fe Springs	Los Angeles County
121.00	Commerce	Los Angeles County and surrounded by many other toxic facilities

119.00	Carson	Los Angeles County and surrounded by many other toxic facilities
117.00	Chino	San Bernardino County
107.00	Rancho Cucamonga	San Bernardino County
94.00	Riverside	Riverside County and still expanding in warehouse development
94.00	Vernon	Los Angeles County and surrounded by many other toxic facilities
80.00	Jurupa Valley	Riverside County and still expanding in warehouse development
76.00	San Bernardino	San Bernardino County and still expanding in warehouse development
75.00	Anaheim	Orange County
75.00	Compton	Los Angeles County
65.00	Corona	Riverside County
61.00	Torrance	Los Angeles County
48.00	Moreno Valley	Riverside County and still expanding in warehouse development
47.00	Rialto	San Bernardino County and still expanding in warehouse development
45.00	Perris	Riverside County and still expanding in warehouse development

Source: Torres,I

APPENDIX

Table 1:*Summary of How Many Warehouse +100,000 Sq Ft are in SCAQMD and perspective areas*
Total number of warehouses that will have to follow the ISR: ***3,321.*** *Source: Torres,I.*

City	Total #of warehouses Per Area	City	Total #of warehouses Per Area
Ontario	289	Wilmington	7
City of Industry	197	EL Segundo	6
Los Angeles	168	La Palma	6
Fontana	140	Panorama City	6
Santa Fe Springs	126	Burbank	5
Commerce	121	Costa Mesa	5
Carson	119	Lake Forest	5
Chino	117	San Fernando	5
Rancho Cucamonga	107	San Pedro	5
Riverside	94	Santa Clarita	5
Vernon	94	Alhambra	4
Jurupa Valley	80	Arcadia	4
San Bernardino	76	Baldwin Park	4
Anaheim	75	Fountain Valley	4
Compton	75	Hacienda Heights	4
Corona	65	Huntington Park	4
Torrance	61	Inglewood	4
Redlands	56	Rancho Santa Margarita	4
Fullerton	51	Chino Hills	3
Long Beach	50	Coachella	3
Moreno Valley	48	Duarte	3
Irvine	47	La Habra	3
Rialto	47	La Puente	3
Perris	45	Los Alamitos	3

Santa Ana	42	Mira Loma	3
Pomona	41	Montclair	3
La Mirada	40	Murrieta	3
Valencia	40	North Hills	3
Buena Park	37	Northridge	3
Rancho Dominguez	35	Panorama City	6
Cerritos	33	Placentia	3
Gardena	30	San Dimas	3
Pico Rivera	27	Seal Beach	3
South Gate	27	South El Monte	3
Montebello	24	Upland	3
Eastvale	23	Bell Gardens	2
Temecula	23	Indio	2
Brea	22	Mentone	2
Colton	22	Norco	2
Sylmar	22	San Juan Capristrano	2
Chatsworth	20	Signal Hill	2
Irwindale	20	Thermal	2
Huntington Beach	18	Westminster	2
Walnut	17	Woodland Hills	2
Bloomington	16	Aliso Viejo	1
Cypress	16	Banning	1
Garden Grove	16	Calabasas	1
Bell	14	Cudahy	1
Hawthorne	14	Desert Hot Springs	1
Azusa	13	Diamond Bar	1
Foothill Ranch	12	Glendora	1
Orange	12	Grand Terrace	1
Van Nuys	12	Hemet	1
El Monte	11	La Verne	1

Sun Valley	11	March Air Reserve Base	1
Lynwood	10	Monrovia	1
Downey	9	Nuevo	1
Pacoima	9	Palm Springs	1
North Hollywood	8	Pasadena	1
Paramount	8	Rowland Heights	1
Tustin	8	San Jacinto	1
Whittier	8	Santa Monica	1
Beaumont	7	Stanton	1
Canoga Park	7	Sunland	1
Norwalk	7	West Covina	1
Redondo Beach	7	Yorba Linda	1

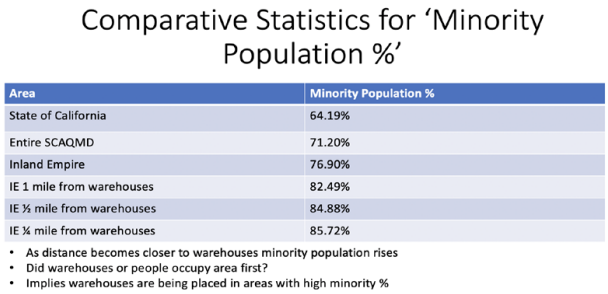


Figure 1: *Comparative Statistics for Minority Populations. Source: University of Redlands*



Figure 2: *Comparative Statistics for Traffic. Source: University of Redlands.*

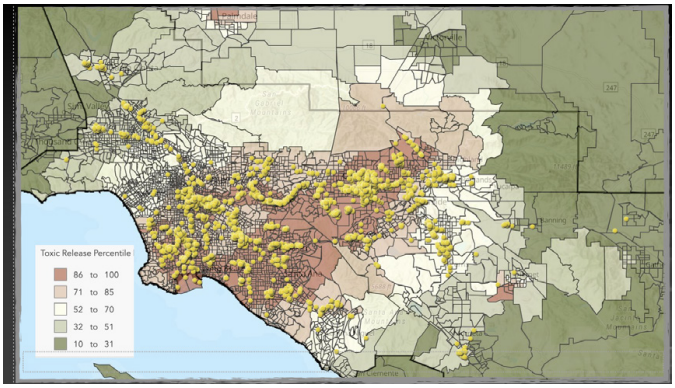


Figure 3: *Map of just Warehouses and Toxic Release Percentiles. Source University of Redlands.*

Article on I- 710 Expansion:

https://lbpost.com/news/trade-transportation/displacement-worries-those-whose-homes-businesses-could-be-in-the-710-expansions-path-as-metro-board-heads-to-a-vote/

Bloomington Business Park Specific Plan Project:

https://ceqanet.opr.ca.gov/2020120545/2#:~:text=The%20proposed%20Specific%20Plan%20is,an%20estimated%2020%2Dyear%20buildout.

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Yuan, Quan & Abstract Environmental impacts of warehousing activities have attracted increasing attention from the governments. (2018, May 07). Mega freight generators in my backyard: A longitudinal study of environmental justice in warehousing location. Retrieved April 14, 2021, from https://reader.elsevier.com/reader/sd/pii/S0264837717309134?token=2039D46FD4D4B3EDCD57FAADE043AD4FBDD418E81792034AAB1B2CBECCBDEB25529A0A3961C20521840A91358BBCA20E&originRegion=us-east-1&originCreation=20210405212514

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South Coast Air Quality Management District OnBase 20.3.2.1000. (n.d.). Retrieved April 10, 2021, from https://onbase-pub.aqmd.gov/sAppNet/FolderPop/FolderPop.aspx?KT275_0_0_0=1403368&FT=111&clienttype=html&chksum=645b7d92906ef74363811092245569eca23d3b41529144e79d07c7325f054a057

Letter I-798

Kyle Warsinski
March 9, 2023

I-798.1 This comment is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-798.2 This comment requests additional mitigation measures to address the significant and unavoidable air quality impacts associated with the proposed Project. Please see Recirculated Section 4.2, Air Quality, for a discussion of the additional mitigation measures being incorporated into the Project. As explained in Recirculated Section 4.2, Air Quality, air dispersion modeling was performed to analyze pollutant concentrations at nearby sensitive receptors, and the analysis indicates that pollutant concentrations would remain well below the applicable SCAQMD localized significance thresholds during Project construction and operation. Additionally, the HRA prepared for the proposed Project (Appendix C-2) indicated that cancer and non-cancer risk to nearby sensitive receptors would be well below the applicable SCAQMD significance thresholds during construction and operation.

The City of Perris prepared a study titled "Air Quality, Greenhouse Gas Emissions, and Environmental Noise Conditions Study for Industrial Developments" in July 2022. As seen in the table below taken from the study, none of the 20 warehouse projects approved in the last 20 years had significant health risk impacts. (Appendix C-4)

REPRESENTATIVE WAREHOUSE PROJECTS APPROVED IN THE CITY OF PERRIS SINCE 2010

Project	Size (square feet)	Significant Impacts After Mitigation				
		Regional Construction Emissions	Regional Operational Emissions	Construction LST	Operational LST	Health Risks
Optimus Logistics Center	1,455,781	No	Yes	No	No	No
IDI Rider 2 & 4	1,352,736	Yes	Yes	No	No	No
Rados Distribution Center	1,191,080	Yes	Yes	No	No	No
Duke at Perris & Markham	1,189,860	No	Yes	No	No	No
Optimus Logistics Center 2	1,037,811	No	Yes	No	No	No
Integra Perris Distribution Center	864,000	No	Yes	No	No	No
Duke at Patterson & Markham	811,620	No	Yes	No	No	No
Duke at Indian and Markham	668,681	No	Yes	No	No	No
Pelican Industrial	600,000	No	No	No	No	No
IDI - Indian and Ramona Warehouse	428,730	No	No	No	No	No
Perris Gateway Commerce Center	380,000	No	No	No	No	No
First Industrial at Rider & Redlands	324,147	No	No	No	No	No
First Industrial Warehouse at Wilson	303,228	No	No	No	No	No
Perris and Morgan Industrial Park	286,179	No	No	No	No	No
IPT Perris DC III Western/Nandina	251,504	No	No	No	No	No
Core5 Rider Business Center	248,483	No	No	No	No	No
First Perry Logistics	241,000	No	No	No	No	No
Walnut and Indian Industrial	205,830	No	No	No	No	No
First Harley Knox Industrial	154,250	No	No	No	No	No
First Industrial Warehouse 2 at Wilson	154,558	No	No	No	No	No

The comment refers to a 2021 report titled "Warehouses, pollution, and social disparities" authored by Torres, Victoria, and Klooster, and the commenter expresses concern regarding potentially disproportionate health impacts to nearby residents. The report analyzes all of Southern California air quality and traffic impacts and is not specific to this Project or region. The report shows that the Project site and surrounding area is in the 52 to 70 toxic release percentile, which is not in the high toxic release percentiles. Recirculated Section 4.2, Air Quality, considers the environmental air quality impacts of the Project on the community surrounding the Project site such as analysis of the potential health risks, including asthma and cardiovascular disease, from criteria pollutant emissions. (Appendix C-1).

I-798.3 This comment is the last paragraph of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 11:36 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and demand that the project applicant be required to make every effort to preserve endangered and threatened wildlife and plant-life in the area.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? The final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant-life

1. Why is the coastal scrub documented in some parts of the DEIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant-life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why was the plant survey conducted during a drought year? How can the DEIR claim it is absent or assess the significance of impact unless its absence has been documented during a year and season of normal rainfall, when the rare plant life would be able to grow?

Given these deficiencies, I demand that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also demand that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that the project will not be destroying rare plant life unless a more thorough survey is conducted.

Finally, I demand that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can the public be assured that these mitigation measures will be enforced?

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-799

Leslie Bushong
March 9, 2023

I-799.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 11:38 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section are highly disconcerting. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than diesel particulate matter will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous military use of the project construction area.

Please specifically address the following items:

1. How did you determine which chemicals to test for and which to omit? Why was diesel particulate matter the only substance considered in the "Human Risk Assessment" section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the weapons bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long timeframe since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I demand that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any others that may have been stored in the weapons bunkers. I also demand that you share with the public all information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil will be treated, given its high concentration.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health, and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I demand that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issuance of demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, those materials must be completely removed.

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-800

Leslie Bushong
March 9, 2023

I-800.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 11:41 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The traffic section of the document presents serious concerns. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project, and the project's own traffic estimates indicate that approximately 20,000 additional trips will use the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in the analysis, especially when considering that the traffic analysis fails to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. The traffic sections also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How can the analysis justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did the analysis exclude known construction projects that have already been permitted to be built?

I demand the traffic section be updated to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable.

How traffic will affect our arterial streets is another major concern. The analysis assumes drivers will use approved paths, but it is clear from experience this is not the case. For instance, on February 2, a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety.

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were considered? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the

predictions match reality, and why should one trust the analysis to be accurate if past analyses underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

I demand that the traffic study be updated to reflect the actual conditions of the surrounding area.

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-801

Leslie Bushong
March 9, 2023

I-801.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 2:36 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am appalled that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses, as long as they are low-density. Please specify what other land uses C-2 zoning allows and why they are not being pursued.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on three sides by residential homes, and that residents have submitted over 2,500 signatures, hundreds of emails, and scores of comments at public meetings opposing the project, how is that feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how can the utter disregard for the community opposition in relation to the reuse plan policies be justified?

In the General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions**"** and **"**Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air-quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways has Community Preference been incorporated in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for “Industrial/Warehousing” uses and it explicitly shows “Industrial/Warehousing” land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as a Business Park or reserved space for the previously endangered Stephen’s Kangaroo Rat.

Moreover, the Draft General Plan 2010 “Draft Vision 2030” Section 2.2.24 states,

The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space. When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to “up zone” the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, the March JPA is obligated to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-802

Leslie Bushong
March 9, 2023

I-802.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 2:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air-quality impacts on surrounding residents. However, beyond that admission, there are numerous deficiencies in the analysis, and it underestimates the air-quality impacts.

The analysis does not consider the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. I demand that these impacts be included in both the local and regional analysis for the final EIR. The analysis also fails to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. The air-quality and health-risk assessment must be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, the project applicant must apply the conservative AQMD Rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, it is important to be more conservative in truck trip rate projections. Using the Rule 2305 numbers would almost double the daily truck trips.

Also, the March JPA has a responsibility to mitigate significant impacts on the surrounding community. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Why were such mitigations not considered in the DEIR for this site?

Significant mitigations must be put in place to reduce the impact on local residents:
1) Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2) Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

The impact on air quality must also be mitigated by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least that can be done to protect the surrounding community. California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning. A minimum of 50% of delivery vehicles must be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. 30% of trucks must also be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I demand that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will the March JPA assure adjacent residents that their interests will be protected?

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-803

Leslie Bushong
March 9, 2023

I-803.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 2:42 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP

Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How was that number calculated? On what evidence was it based? There is no analysis in the DEIR to justify the number of jobs. Please provide a detailed, evidence-based analysis justifying the number of jobs.

The Greenhouse Gas (GHG) section claims that the development will have a net positive effect because local community members will have less of a commute driving to work. No one with a temporary, part-time, and/or low-paying warehouse job will be able to afford to live anywhere within the surrounding community? On what data was the assumption that local residents need or desire low-paying warehouse jobs based? What data was used to calculate the vehicle miles travelled? How were the traffic models that assume 21-mile commutes would be shortened to 16-mile commutes created? Please justify the assertions by providing data detailing the mean, median, and mode monthly salary of the jobs that will be created and the mean, median, and mode monthly rent/mortgage in the surrounding communities. It is clear that the job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region far exceeds the number of available employees in the region. The current unemployment rate is at a 50-year low, and there are over 4,000 acres of approved and planned warehouses along the 215/60 corridor. At 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318,000 in Riverside, 212,000 in Moreno Valley, 80,000 in Perris, and 20,000 in Mead Valley). There are about 300,000 people in the labor force (For those aged 16+, the labor force participation rate is 62%.). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work in warehouses. Assuming that 50% can work in warehouses, that still leaves well over 20,000 jobs to be filled. The population growth (<1% per year) in our

region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support any additional warehouse jobs. The only way to fill those jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the vehicle miles travelled per employee estimates indicating shorter commutes are incorrect. This project will further exacerbate housing stress by requiring workers to commute from well outside of a 15-mile radius of the project. Even if allowed for the faulty assumption that locals would commute to the site, how would the analysis change if one accounts for automation in warehouses, or the fact that Californians are required to purchase electric vehicles by 2035? Please justify the current vehicle miles travelled per employee estimates using actual job, population, and housing estimates from the last three months, rather than seven-year-old SCAG projections that are completely incorrect.

It is obvious that the region does not have the capacity to staff these warehouses locally. Please consider more appropriate alternatives for the project, such as single-family residential homes that would actually serve to improve the real-world jobs-to-housing imbalance. Housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-804

Leslie Bushong
March 9, 2023

I-804.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 2:43 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Dan Fairbanks, AICP

Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project site comprises approximately 817.9 acres within the western portion of the March JPA planning sub-area (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and the City of Moreno Valley.

The zoning designation in the DEIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities, but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have, including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant?" Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. The March JPA must demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here. Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex

within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? Furthermore, the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. The Aesthetics section must be revised, so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Images that reflect the actual appearance of warehouses in the area must also be used. Otherwise, the images and the Aesthetics section are a lie and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond the visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which have been identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of Western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. The March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large, industrial, mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal, low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan, and the community demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. They also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered, and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Do not allow one final, grand act of poor land use planning to be the lasting legacy of the March JPA.

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-805

Leslie Bushong
March 9, 2023

I-805.1 This comment letter is Form Letter A – Aesthetics. As such, in response to the remainder of this comment, please see Form Letter A Response.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 2:44 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I have lived in the same house in the Orangecrest neighborhood for 23 years. During that time, I have joined my neighbors in attempting to work with the March Joint Powers Authority on responsible planning for the 4,400 acres of surplus property. My neighbors and I worked to oppose the DHL cargo facility in the early aughts. We were ignored, and DHL failed within four years. My neighbors and I have worked over the past 15 years to oppose the development along Meridian Parkway and Van Buren Boulevard. We have been ignored, and one merely needs to drive those roads to see the numerous unoccupied, nondescript, and/or anemic buildings, many of which have remained vacant since they were built.

The March Joint Powers Authority has demonstrated its poor planning, lack of foresight, and utter disregard for Riverside residents' well-being and safety for at least the past 23 years. The West Campus Upper Plateau Project is only the most recent misguided and uninformed project that, similar to past projects, will be detrimental to the quality of life for local residents.

Riverside consistently ranks near the top of any list of cities in California in terms of pollution and traffic congestion. The West Campus Upper Plateau Project will only exacerbate the pollution and traffic congestion in Riverside. I demand that the developer revise the entire project to include non-industrial alternatives, as has been consistently requested by the community for over a year.

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-806

Leslie Bushong
March 9, 2023

I-806.1 This comment letter is the same as Comment Letter I-715. As such, in response to this comment, please see Response I-715.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 2:45 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I have lived in the Orangecrest neighborhood since March of 2000. Over the past 23 years, I have experienced the same deception and lies from the March JPA as are presented in the draft environmental impact report: lies about jobs that don't pay enough for employees to even live in the City of Riverside and that, with automation, will soon be obsolete; lies about parks, trails, and open spaces that never come to fruition; and lies about construction, an abundance of which is currently vacant and has never been occupied. Those lies have systematically transformed one of the most desirable and attractive residential neighborhoods in the City of Riverside into a sea of unsightly office buildings and warehouses that are inconsistent with responsible city planning. The March JPA is using the same tactics to promote the West Campus Upper Plateau Project.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in that document. They also have a duty to work with local communities to develop the West Campus Upper Plateau in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project must be reconsidered, and reasonable alternative configurations must be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come.

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-807

Leslie Bushong
March 9, 2023

I-807.1 This comment letter is the same as Comment Letter I-716. As such, in response to this comment, please see Response I-716.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 2:46 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

What do an airplane crashing into a warehouse, a warehouse fire, and a jack-knifed big rig on a residential street that stopped traffic for 45 minutes have in common? They all occurred in the Orangecrest neighborhood of Riverside within the past three years, with the warehouse fire and jack-knifed big rig both occurring on September 12 of this year; all three put local residents in danger; and all three were the result of the poor planning, lack of foresight, and utter disregard for local residents' well-being and safety demonstrated by the March Joint Powers Authority for at least the past 23 years. The West Campus Upper Plateau Project is only the most recent misguided and uninformed project that, similar to past projects, will be detrimental to the quality of life for Riverside, Perris, and Moreno Valley residents.

Riverside consistently ranks near the top of any list of cities in California in terms of pollution and traffic congestion. If you have any doubts about that you should contact the California Air Resources Board on Iowa Avenue in Riverside or the College of Engineering Center for Environmental Research and Technology at UC Riverside, rather than relying on the biased environmental impact report that the developer clearly paid to be written in their favor. If the project is approved, the traffic and pollution problems will most certainly worsen, and they won't be localized to the City of Riverside. The City of Perris and the City of Moreno Valley will necessarily experience the detrimental impacts, as well.

I demand that the developer specifically address how traffic and pollution problems will be mitigated, how big rigs will be strictly prohibited from using residential streets in perpetuity, and how airplane crashes and warehouse fires can be guaranteed never to occur again. If the developer is unable to meet any of those demands, the project should not be allowed to proceed.

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-808

Leslie Bushong
March 9, 2023

I-808.1 This comment letter is the same as Comment Letter I-653. As such, in response to this comment, please see Response I-653.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 2:48 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (DEIR) on the West Campus Upper Plateau Project (Project).

The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents' homes, a proposed park, and reserved passive recreation areas, and are cited less than a quarter mile from a preschool. The DEIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan, you have ignored the community, and it seems you did so intentionally. For twelve months, we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and other sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area, and I have serious concerns with the lack of alternate plans in the DEIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the West Campus Upper Plateau. I am in favor of each of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you,

Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-809

Leslie Bushong
March 9, 2023

I-809.1 This comment letter is Form Letter H – Alternatives. As such, in response to this comment, please see Topical Response 8 – Alternatives.

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From: Bushong <bushong.family@verizon.net>
Sent: Thursday, March 9, 2023 2:49 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Over the past 23 years, the March JPA has never meaningfully engaged with the community, has never formed a community advisory board to guide their development decisions, and has never pursued a project that respects the safety, well-being, and quality of life of residents. Instead, the March JPA has ignored the concerns of the community and hidden from scrutiny by withholding information from the community and scheduling meetings in the middle of the day when most community members are unable to attend.

Ignoring the concerns and opposition of the community has resulted in, among other disasters, an airplane crashing into a warehouse, a warehouse fire, and a jack-knifed big rig on a residential street that stopped traffic for 45 minutes, each of which put residents in danger, and all three of which were the result of the lack of foresight and utter disregard for residents' safety and well-being demonstrated by the March JPA. The proposed West Campus Upper Plateau project will only increase the possibility of similar disasters and place them even closer to residential homes.

I demand that the developer specifically address how big rigs will be strictly prohibited from using residential streets in perpetuity and how airplane crashes and warehouse fires will be guaranteed never to occur again. If the developer is unable to meet those demands, the project should not be allowed to proceed.

Thank you,
Leslie Bushong
8562 Orchard Park Drive
Riverside, CA 92508
bushong.family@verizon.net

Letter I-810

Leslie Bushong
March 9, 2023

I-810.1 This comment letter is the same as Comment Letter I-707. As such, in response to this comment, please see Response I-707.

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From: Lenora Mitchell <rageturner@gmail.com>
Sent: Thursday, March 9, 2023 7:27 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Lenora Mitchell
14170 Vista Grande Dr

Letter I-811

Lenora Mitchell
March 9, 2023

I-811.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Thursday, March 9, 2023 9:38 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely, Linda K TingleyRivera
<include name, address, email in signature line>

Letter I-812

Linda Tingly
March 9, 2023

I-812.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Thursday, March 9, 2023 9:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Linda TingleyRivera, 922 Kilmarnock Way, Riverside,Ca 92508 Linda.tingley@yahoo.com <include name, address, email in signature line>

Sent from my iPhone

Letter I-813

Linda Tingly
March 9, 2023

I-813.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Thursday, March 9, 2023 9:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

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Thank you for allowing me to provide comments on this project.

Sincerely,
Linda TingleyRivera, 922 Kilmarnock Way, Riverside,Ca 92508 Linda.tingley@yahoo.com <include name, address, email in signature line>

Sent from my iPhone

Letter I-814

Linda Tingly
March 9, 2023

I-814.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Thursday, March 9, 2023 9:49 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Linda TingleyRivera, Linda.tingley@yahoo.com 922 Kilmarnock Way, Riverside,Ca 92508,

Sent from my iPhone

Letter I-815

Linda Tingly
March 9, 2023

I-815.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Thursday, March 9, 2023 9:51 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

<Linda TingleyRivera, 922 Kilmarnock Way, Riverside,Ca 92508 Linda.tingley@yahoo.comp

Sent from my iPhone

Letter I-816

Linda Tingly
March 9, 2023

I-816.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Linlin Zhao <fredzhaolin@gmail.com>
Sent: Thursday, March 9, 2023 10:44 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties in this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors.
It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to the industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I favor these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium
of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and
recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership

with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values.
No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Lin Zhao
Riverside, CA 92508

Letter I-817

Lin Zhao
March 9, 2023

I-817.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Mary Harris <mjharris157@hotmail.com>
Sent: Thursday, March 9, 2023 3:03 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
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· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
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· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
<Mary Harris
9261 Whiting Way
Riverside, CA. 92508
mjharris157@hotmail.com
include name, address, email in signature line>

Letter I-818

Mary Harris
March 9, 2023

I-818.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Mark Jessen <mclnjessen@gmail.com>
Sent: Thursday, March 9, 2023 7:36 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Mark Jessen
8768 Senna Ln, Riverside, CA. 92508
email: mclnjessen@gmail.com

Letter I-819

Mark Jessen
March 9, 2023

I-819.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Mark Jessen <mclnjessen@gmail.com>
Sent: Thursday, March 9, 2023 7:37 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Mark Jessen
8768 Senna Ln, Riverside, CA. 92508
email: mclnjessen@gmail.com

Letter I-820

Mark Jessen
March 9, 2023

I-820.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Mark Jessen <mclnjessen@gmail.com>
Sent: Thursday, March 9, 2023 7:37 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Mark Jessen
8768 Senna Ln, Riverside, CA. 92508
email: mclnjessen@gmail.com

Letter I-821

Mark Jessen
March 9, 2023

I-821.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

INTENTIONALLY LEFT BLANK

From: Mark Jessen <mclnjessen@gmail.com>
Sent: Thursday, March 9, 2023 7:39 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Mark Jessen
8768 Senna Ln, Riverside, CA. 92508
email: mclnjessen@gmail.com

Letter I-822

Mark Jessen
March 9, 2023

I-822.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Mark Jessen <mclnjessen@gmail.com>
Sent: Thursday, March 9, 2023 7:39 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,
Mark Jessen
8768 Senna Ln, Riverside, CA. 92508
email: mclnjessen@gmail.com

Letter I-823

Mark Jessen
March 9, 2023

I-823.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Mark Jessen <mclnjessen@gmail.com>
Sent: Thursday, March 9, 2023 7:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Mark Jessen
8768 Senna Ln, Riverside, CA. 92508
email: mclnjessen@gmail.com

Letter I-824

Mark Jessen
March 9, 2023

I-824.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Mark Jessen <mclnjessen@gmail.com>
Sent: Thursday, March 9, 2023 7:40 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Mark Jessen
8768 Senna Ln, Riverside, CA. 92508

Letter I-825

Mark Jessen
March 9, 2023

I-825.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Mark Jessen <mclnjessen@gmail.com>
Sent: Thursday, March 9, 2023 7:40 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Mark Jessen
8768 Senna Ln, Riverside, CA. 92508
email: mclnjessen@gmail.com

Letter I-826

Mark Jessen
March 9, 2023

I-826.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Thursday, March 9, 2023 8:02 AM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: AQ.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

I-827.1

Attached please find a comment on the air quality section of the draft EIR.

Please email me to confirm receipt of this public comment.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation area; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. I-827.2

The draft EIR Air Quality section (sections 4.2 and Appendices C1, C2) systematically underestimates the air quality and health risk impacts to the community and region. It fails to evaluate cumulative impacts on both local and regional scales and engages in a series of flawed assumptions that demonstrably underestimate cumulative health risk. As a PhD atmospheric scientist from UC Berkeley with 20 years of experience in health risk assessment[1,2,3] and data analysis examining gradients in near-road pollution near-roadways[4,5,6,7,8], I am astonished at the chained underestimates of the risk to human health made within this planning document. I ask that these deficiencies be addressed to accurately the cumulative effects of warehouse development in our region on human health, rather than minimize the potential dangers of yet more transportation related pollution on our roads, freeways, and in our communities that are already disproportionately impacted by the second largest cluster of warehouses in the region. I-827.3

1) The overall project health risk assessment (HRA) exhibits a systemic bias in evaluating cancer risk through a series of individual decisions that all bias the results lower than a comprehensive analysis. Cumulatively, these choices display a callous disregard for the residents of the area and the true health-risk that will be experienced by residents. The HRA I-827.4
    a. omits adjacent projects and regionally cumulative truck impacts to the 215 freeway from the analysis (undercounts emissions)

[1] https://ehp.niehs.nih.gov/doi/full/10.1289/ehp.11861
[2] https://www.tandfonline.com/doi/pdf/10.1080/10473289.2006.10464436
[3] https://www.mdpi.com/1660-4601/17/3/1080/pdf
[4] https://www.tandfonline.com/doi/pdf/10.1080/10962247.2020.1734113
[5] https://pubs.acs.org/doi/pdf/10.1021/es062767i
[6] https://onlinelibrary.wiley.com/doi/abs/10.1111/ina.12015
[7] https://www.sciencedirect.com/science/article/pii/S1361920920306295
[8] https://www.sciencedirect.com/science/article/abs/pii/S1352231020305070

b. omits toxic air contaminants from consideration other than diesel PM (undercounts hazard)
c. omits the proposed park as a sensitive receptor site despite children exercising directly adjacent to warehouses (neglects evaluation of sensitive receptors in closest proximity to emissions)
d. drastically undercounts the truck trip rates, diesel PM emissions, and TRU idling associated with the 725,000 SF high-cube fulfilment center and the 500,000 SF cold-storage warehouse by omitting its own indicated 'east-side' dock doors from Appendix C2 – Table 2-4.
e. omits the cumulative health risks of the multi-pollutant mixture of mobile-source project related pollution other than diesel PM. The pollutants of benzene, formaldehyde, acetaldehyde, 1,3-butadiene, chromium, nickel, and naphthalene from mobile sources should be included as they are cumulatively important to total risk levels, especially given the high relative ratios of passenger vehicles to heavy-duty trucks from fulfillment center warehouses (e.g., Figure 4-7, MATES V)[9].

I-827.4 Cont.

2) The Project regional air quality analysis omits local vicinity and regional projects that are cumulatively considerable and of importance. The project near-field air quality analysis excludes more than 60 existing warehouses totaling over 20 million square feet within a few miles of the project. The project regional analysis of NO_x, $PM_{2.5}$, and ozone excludes the regional cumulative impact of over 100 million square feet of existing warehouses and the planned/approved impact of another 75 million+ square feet along the I-215 and SR-60 corridors. These warehouses have largely been approved by March JPA and its member agencies and must be evaluated and disclosed within the regional impacts.

I-827.5

The Health Risk Assessment Systematically Underestimates Risk

The Health Risk Assessment (HRA) described in Section 4.2 and Appendix C2 estimated the carcinogenic risk from diesel PM for residents around the project. However, a series of poorly considered decisions and inaccurate assumptions systematically biased the risk levels lower.

1. The HRA omits known emissions sources from past, present, and probable future warehouses that I believe would contribute significant additional carcinogenic risk from both diesel PM and other mobile source air toxics (see bullet 2a below).
    a. The HRA omits dozens of nearby existing warehouses and under construction warehouses from the model (see next section and cumulative impacts letter) – which cumulatively add thousands of every extra idling trucks around our community. These are not included in the Appendix C2 HRA.
    b. The HRA omits many surrounding truck routes from the HRA – compare Appendix N – Exhibit 2-C included below and the Truck Route maps (JPA #21-02, City of Riverside, County of Riverside) which cumulatively include tens of thousands of trucks and passenger vehicles emitting pollution.
        i. March JPA Truck routes (Meridian, Van Buren, Krameria)
        ii. City of Riverside Truck routes (Alessandro Blvd)

I-827.6

[9] http://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report-9-24-21.pdf?sfvrsn=6

iii. County of Riverside Truck routes (Brown Street)
iv. the I-215 freeway and State Route 60 freeway

c. The HRA omits the construction of South Barton Road from its emissions domain (see Appendix C2 – Exhibit 2-A) which is a few hundred feet from a preschool with vulnerable young children.

d. The HRA omits the construction activities and installation of a water tank from its emission domain (see Appendix C2- Exhibit 2-A) which is fewer than fifty feet from adjacent homes.

I-827.6 Cont.

2. The HRA omits known carcinogens that add significant health risk emitted from Project construction and operational activities from its hazard assessment.
   a. The SCAQMD Figure ES-2 in MATES V[10] clearly indicates only 50% of cancer risk in the basin is attributable to diesel PM; other named significant contributors are all emitted directly or indirectly by mobile sources identified as nationally significant contributors to cancer risk[11]
      i. Benzene
      ii. 1,3-butadiene
      iii. Acetaldehyde
      iv. Formaldehyde
      v. Naphthalene
      vi. Ethylbenzene
      vii. polycyclic aromatic hydrocarbons (PAHs)).
   b. Therefore, basing a health-risk assessment on heavy-duty truck emissions alone will significantly underestimate total carcinogenic health-risk from the project by at least 50%.

I-827.7

3. The HRA doesn't include the proposed Park as a sensitive receptor in its analysis, despite clear guidance from the CARB handbook, WRCOG, City, and County of Riverside Good Neighbor Guidelines that all define parks as sensitive receptors. The proposed 60-acre park is situated less than 100 feet across the street from four warehouses, and less than 500 feet from a major arterial and an arterial highway. It is less than 800 feet from the industrial warehouse loading docks. Given that the children using this park will be exercising, their increased respiration rate will increase the dose of carcinogenic exposure from the adjacent warehouses emissions.

I-827.8

4. The HRA botches its modeled operational on-site emissions for the industrial warehouses in Appendix C2.
   a. Exhibit 2-B clearly shows a map of the old site plan. This Exhibit does not match the reported Dock doors and truck idling rate locations in Appendix C2 – Table 2-4 for the Building 'A'. First, the incorrect number of business park buildings are shown, indicating that emissions locations for buildings D-K (7 buildings) are not consistent with the current site plan for the project. More importantly, dock door locations for Building A should have dock doors to the north, east, and south. The Table 2-4 only shows dock

I-827.9

[10] http://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report-9-24-21.pdf?sfvrsn=6
[11] https://ehp.niehs.nih.gov/doi/full/10.1289/ehp.11861

doors in two orientations (104 idling trucks north and south for A).

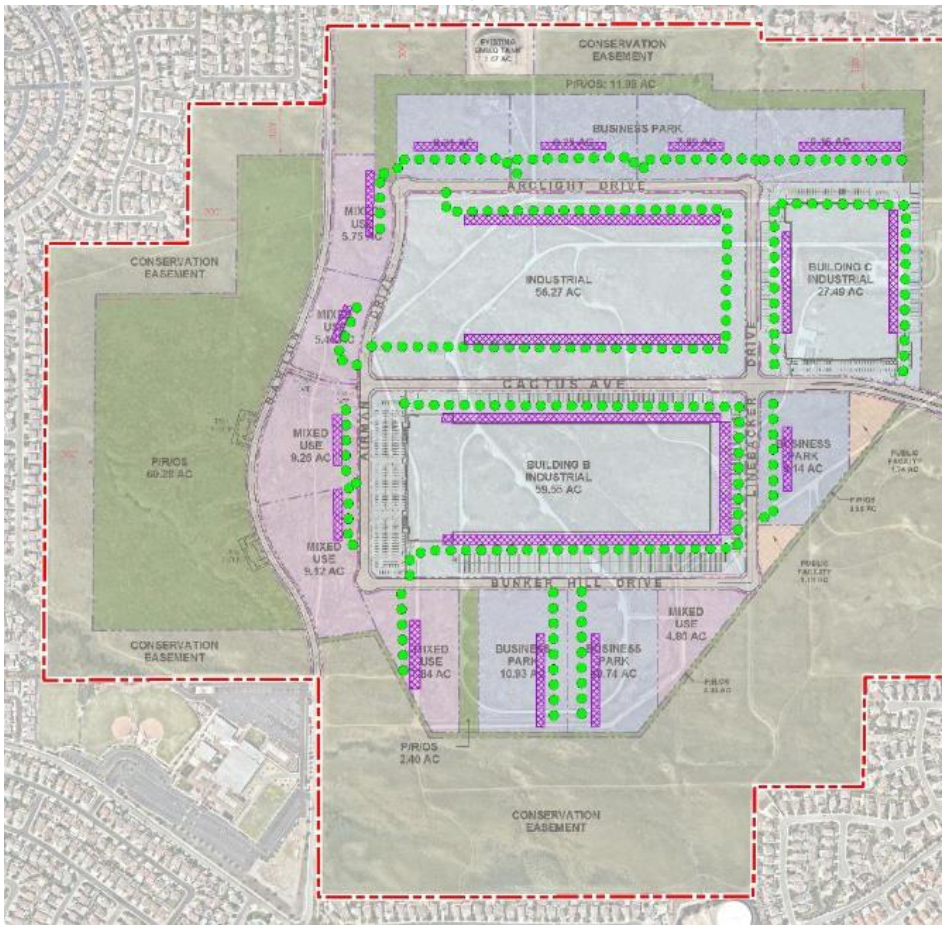


Exhibit 2-B from Appendix C2

b. The truck emissions for 'Building A' and Building B in Appendix C-2 **Table 2-4** are incorrect. Building A should have the highest number of truck and the highest emissions of diesel PM according to the truck trip estimates in **Table 4.15-1** (474 truck trips for building B, 222 truck trips for building C, and 652 truck trips for 'Building A' (376 + 276 for high-cube and remaining industrial) combined. However, Appendix C-2 **Table 2-4** shows that Building A has 418 Trucks per day, Building B has 640 trucks per day, and Bldg C has 290 trucks per day. This underestimates diesel PM on-site emissions by at least 22%.

c. As noted in my transportation comment letter and shown in **Table 1**, the truck trip rates used in the analysis are far lower than the SCAQMD 2305(d)1(C) weighted average truck trip rates and likely underestimate daily heavy-duty truck trips by a factor of 2. This is yet another underestimate in the same direction that lowers the HRA estimates. This again underestimates diesel PM emissions by 100%. Using the SCAQMD Rule 2305 WTTR values results in a more than doubling of truck trips for the project. That would seem to suggest that the default truck trip rates from ITE and WRCOG are likely to be underestimates of true truck trip rates.

I-827.9 Cont.

		Truck Emission Rates	
Source	Trucks Per Day	VMT [a] (miles/day)	Truck Emission Rate [b] (grams/mile)
On-Site Idling - Bldg A North	104		
On-Site Idling - Bldg A South	104		
On-Site Idling - Bldg B North	107		
On-Site Idling - Bldg B East	107		
On-Site Idling - Bldg B South	107		
On-Site Idling - Bldg C West	73		
On-Site Idling - Bldg C East	73		
On-Site Idling - Bldg D	31		
On-Site Idling - Bldg E	39		
On-Site Idling - Bldg F	39		
On-Site Idling - Bldg G	39		
On-Site Idling - Bldg H	39		
On-Site Idling - Bldg J	30		
On-Site Idling - Bldg K	39		
On-Site Idling - Bldg MU 98k North	18		
On-Site Idling - Bldg MU 77k	15		
On-Site Idling - Bldg MU 131k	25		
On-Site Idling - Bldg MU 98k South	18		
On-Site Idling - Bldg MU 110k	21		
On-Site Travel - Bldg A	418	378.92	0.0178
On-Site Travel - Bldg B	640	604.16	0.0178
On-Site Travel - Bldg C	290	157.68	0.0178
On-Site Travel - Bldg D	62	9.68	0.0178
On-Site Travel - Bldg E	78	11.91	0.0178
On-Site Travel - Bldg F	78	11.82	0.0178
On-Site Travel - Bldg G	78	13.05	0.0178

I-827.9 Cont.

Table 2-4 from Appendix C2

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

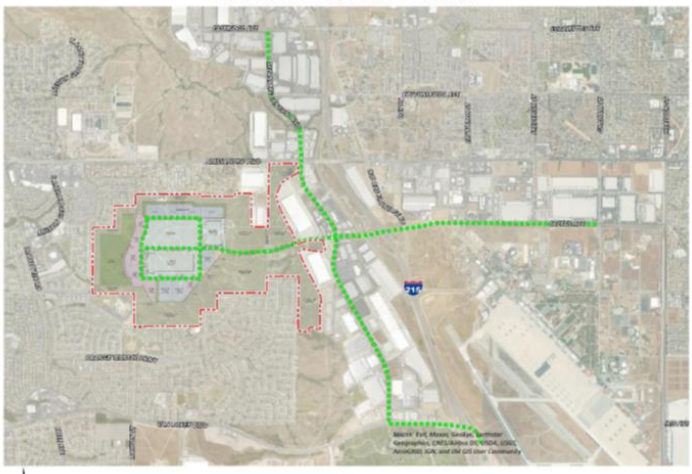
	Warehousing	High-cube fulfillment center	Cold storage	Total
total trip rate	12.44	2.129	2.12	
passenger trip rate	11.87	1.75	1.37	
Truck rate per TSF (Project)	**0.57**	**0.379**	**0.75**	
Rule 2305 truck rate per TSF	**0.67**	**0.95**	**2.17**	
Difference in truck rate	**0.1**	**0.571**	**1.42**	
Cumulative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

d. Therefore, someone failed to accurately transcribe the truck trips from the Building A and Building B in the correct location and quantity. As a result the modeled diesel PM emissions are incorrectly located and the number of idling TRUs is underestimated and generated incorrectly. Correctly reallocating trucks will change both the location and magnitude of emissions from the diesel PM trucks by at least 20%.
e. The project excludes off-site emissions from multiple nearby truck routes and the I-215 freeway which is almost exactly 0.75 miles from the nearest homes in the neighborhood. Given that over 20,000 trucks traverse that roadway daily, almost all of which are attributable to warehouses, it is important to include this facility in the off-site emissions health risk assessment. It is absurd to include Cactus Avenue in Moreno Valley but exclude the I-215 freeway, Van Buren, Alessandro, Brown Street, and Krameria Avenue.

I-827.9 Cont.

The combination of the undercounted emissions sources (at least 50 warehouses and associated idling trucks; at least 4 truck routes and a freeway), inadequate modeling domain, omission of carcinogens, and omissions of locally important sensitive receptors is leading to a cumulative misrepresentation of the cumulative project health-risk on the community. I estimate that the combined synergy of these effects will at least quadruple the diesel PM emissions. Adding in the missing carcinogens will basically double the cancer risk again. Cumulatively, I believe this will exceed the 10-in-a-million cancer risk threshold. Additionally, I note later in the errata section that the choice of the Riverside Municipal Airport wind rose will also systematically bias the results low; the Perris Valley station is more representative of the higher elevation West Campus Upper Plateau winds.

EXHIBIT 2-C: MODELED OFF-SITE EMISSION SOURCES



I-827.10

The March JPA Health Risk Assessment is significantly underestimating cumulative cancer risk. I ask that the March JPA justify and revise its health risk assessment.

1) Justify the omission of nearby approved and planned projects from construction phase HRA impacts.
2) Justify the omission of the surrounding truck routes from the modeling domain, especially Van Buren, Krameria, Brown St. Alessandro, and the 215 freeway.

3) Justify omitting the operational warehouse impacts (i.e., existing truck idling and car traffic from March JPA warehouses) from the HRA during the construction phase of the Project's warehouses. The residents are exposed to both the existing operational emissions and the construction phase emissions, not just the latter.
4) Justify the omission of known mobile source related pollutants from the HRA, given their significant contributions to cancer risk in the South Coast Air Basin and nationally.
5) Justify omitting the park from the set of sensitive receptors, given its proximity to the warehouses. I would hope that the health of the children exposed to the emissions from your project are of utmost importance, rather than a mere oversight.
6) Justify the incorrect table of models and inadequate modeling of TRU emissions by failing to accurately transcribe the truck trips to the correct buildings in the health risk assessment.
7) Justify omitting walking trails and passive recreation areas from the list of sensitive receptors in your analysis – these trails are required to be open and are intended for community use yet are completely omitted as a possible location for micro-exposures.

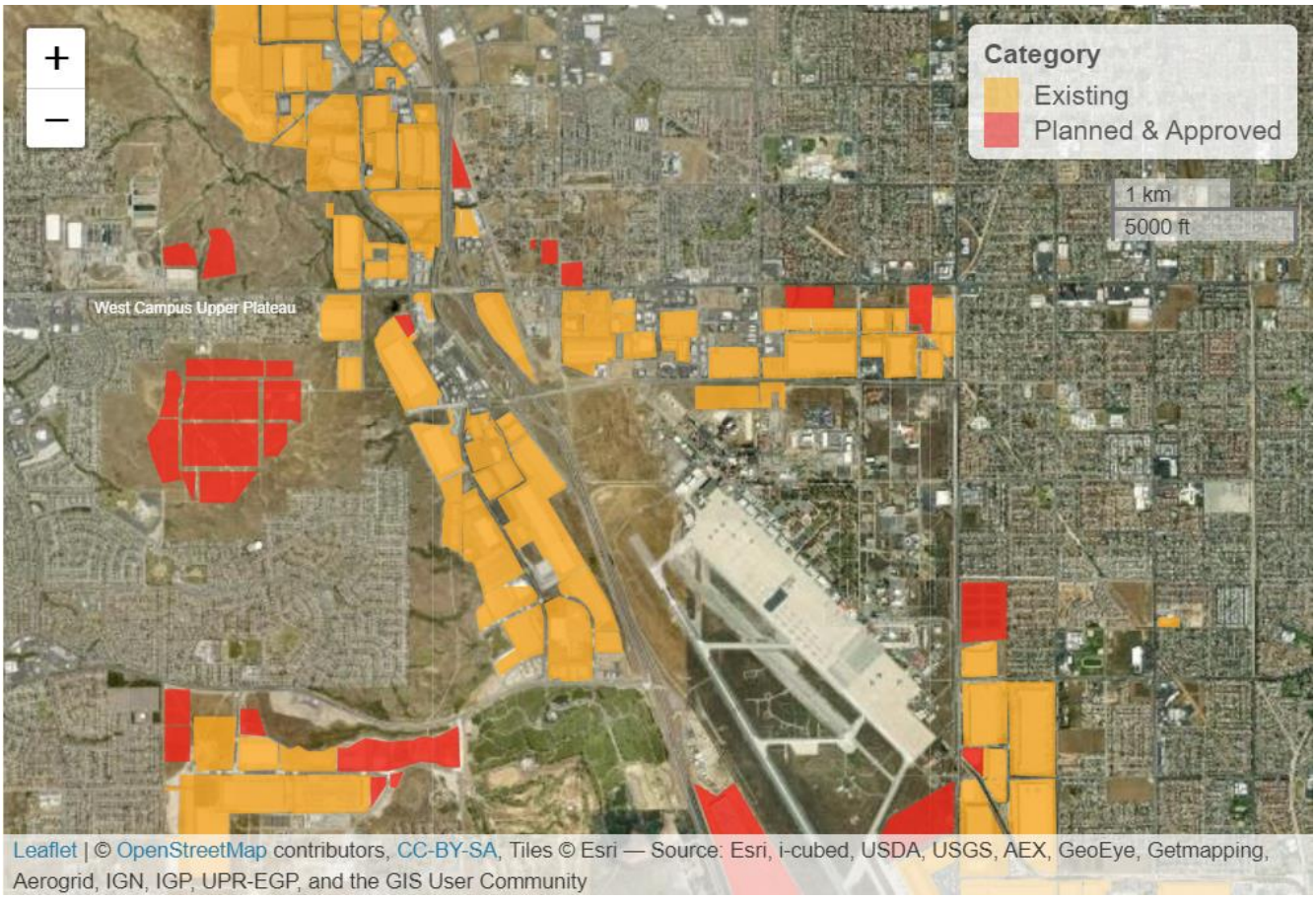
I-827.10 Cont.

Air Quality Analyses exclude both immediate and regional cumulative impacts

Immediate Vicinity – Health Risk Analysis Omissions

Multiple warehouse projects are planned/approved and under construction surrounding the Project. The Air Quality construction analysis omits these nearby projects from the cumulative analysis of construction emissions and omits the operational impacts of existing warehouse truck and car traffic during the construction phase. **Figure 1** shows the immediate vicinity of the project with approved and planned projects. Multiple other warehouses are likely to be under construction or operational during the construction phase of this project. There are over 100 million square feet of existing warehouses within 6 miles of the proposed project and there are over 5 million square feet of approved and under construction warehouses within 3 miles of the project. I detail the full list of projects in the Cumulative Impacts Letter but wanted to specifically identify those impacts on air quality for this section.

I-827.11



I-827.11 Cont.

Figure 1- Proposed project (West Campus Upper Plateau) within the context of existing (brown) and approved/planned warehouses within a few miles of the project site.

Given that the projects cumulative impacts are cumulatively considerable when considered within the context of additional construction and operational diesel PM and other toxic air contaminant impacts (formaldehyde, acetaldehyde, benzene, naphthalene, 1,3-butadiene, ethylbenzene, and polycyclic aromatic hydrocarbons), it is important to include these localized impacts in the air quality and health-risk analyses.

Therefore, I ask that the March JPA

1) Justify excluding construction emissions from Sycamore Hills Distribution center, Buildings E, F, G, and 1 in the South Campus, and Meridian Building West. Other nearby under construction project include buildings H, I, 2, 3 in the South Campus, Old 215, Moreno Valley Commerce Center, the Edgemont Commerce Center, Meridian D1 Aviation Gateway, First March Logistics Project, Oleander Business Park, and Compass Danbe Centerpointe.
2) Justify excluding the operational emissions from trucks along March JPA truck routes in its air quality and health-risk analysis during the construction phase of the West Campus Upper Plateau. Specifically, justify excluding Alessandro Blvd, Meridian Parkway, Brown St., Van Buren and the 215 Freeway from the Health-Risk Analysis and localized air quality analysis during the 2023-2028 construction phase.
3) Demonstrate that the Construction Phase Air Quality thresholds of significance as estimated in Table 4.2-7 are met when including applicable regional construction and operational level impacts surrounding the project in addition to the specific project's impacts. Current estimates

fail to include other immediate vicinity and regional projects under construction which will cumulatively impact the project.

I-827.11 Cont.

Regional Analysis – Regional Air Quality issues – ozone, NO_2, and $PM_{2.5}$

In the regional analysis of cumulative air quality impacts, the scope of the analysis is completely inadequate. As mentioned in the cumulative impacts letter, the Air Quality section's regional scope is the South Coast Air Basin. Even if we limit the scope to merely a 10-mile buffer around the project, the intense scale of warehouse development along the 215/60 corridor is obvious as shown in **Figure 2**. The existing footprint[12] of warehouses is over 280 million square feet. The cumulative additional footprint of approved and planned warehouses in the region is another 207 million square feet, nearly doubling the existing footprint and cumulatively approaching a half a billion square feet devoted to warehouses within 10 miles of this project. The March JPA has 5 million square feet approved and under construction. Moreno Valley has the enormous World Logistics Center contributing over 100 million square feet of warehouse footprint. The County of Riverside has many projects in Mead Valley and the large Stoneridge Commerce Center (~20 million square feet footprint) near Nuevo. The Project's cumulative impact project list omits 90% of this area and projects, deliberately underestimating the regional scale of the past, present, and proposed future projects. Given the regional character of air quality problems in the SCAQMD area, it is important to identify the regional patterns in development that are characterizing the local land-use authority decisions cumulatively.

I-827.12

[12] Footprint = parcel area in square feet – includes both building size and parking lots and landscaping. Building size will depend on exact floor area ratio, but typical FAR are 0.4-0.65 within the area.

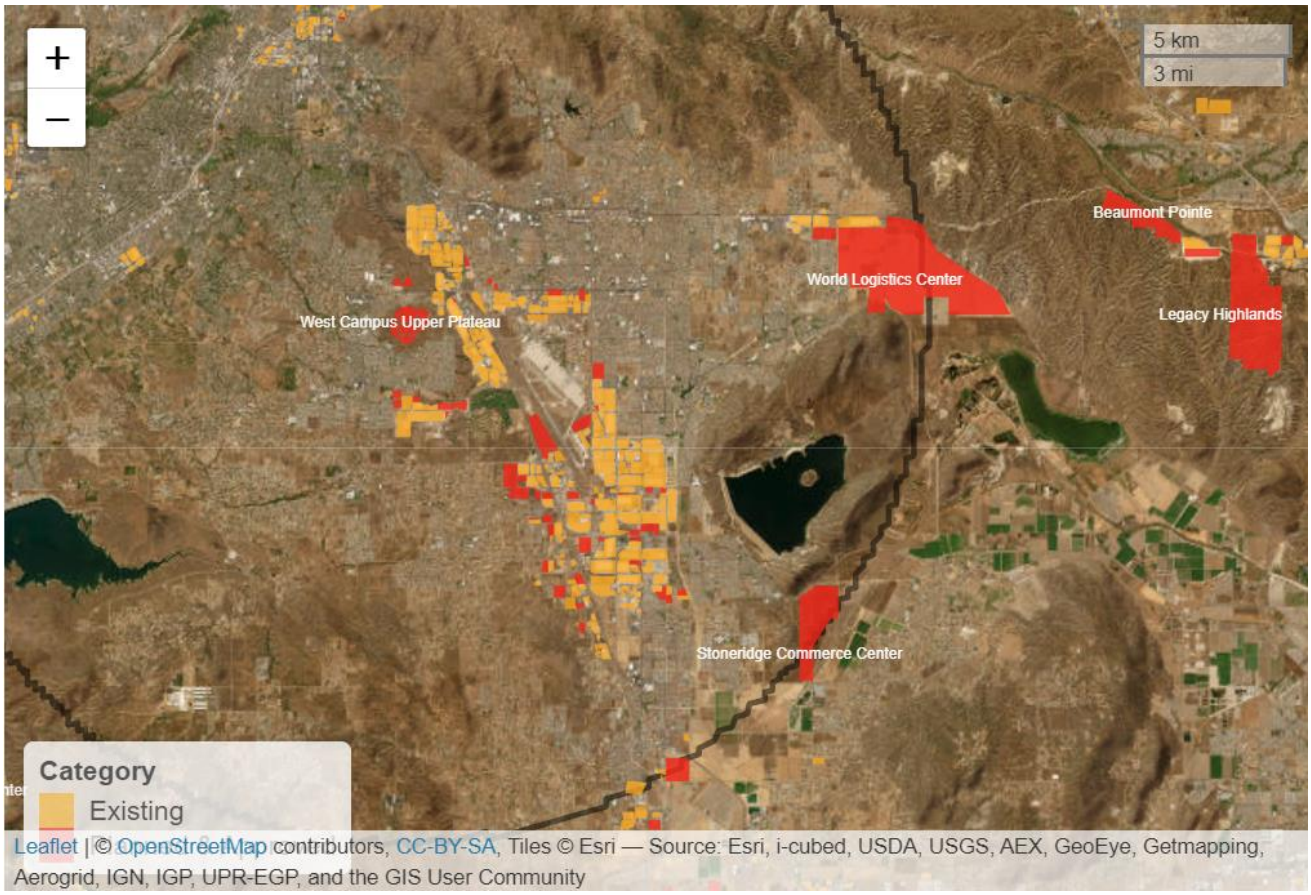


Figure 2 – Regional map of existing, approved, and planned warehouse projects within Riverside County. The

The recently approved 2022 Air Quality Management Plan by the South Coast Air Quality Management District describes the joint and individual responsibilities of various agencies in improving air quality regionally. Two types of emissions management are possible – emissions controls and emissions demand management. Figure 1-1 from the AQMP[13] indicates the responsible agencies.

I-827.12 Cont.

[13] http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/04-ch1.pdf?sfvrsn=12



FIGURE 1-1
ILLUSTRATION OF LOCAL, STATE, AND FEDERAL AGENCIES AND THEIR AUTHORITY OVER EMISSIONS CONTROL TECHNOLOGY OR EMISSIONS DEMAND MANAGEMENT.[8]

On the left-hand side, the U.S. Environmental Protection Agency, California Air Resources Board, and South Coast Air Quality Management District are responsible for emissions controls. Tailpipe emissions and local permits are controlled by these agencies. On the right-hand side, the land-use agencies are the ones responsible for local emissions demand management. Southern California Association of Governments, individual cities like Riverside, Los Angeles, and Ontario, and joint powers authorities like the March JPA control emissions demand by deciding what types of land-use to allow and the cumulative use of land. As it notes, "*Goods movement is a substantial source of smog-forming emissions in our region and the goods movement sector has recently experienced substantial growth in the region. Projections indicate that this expansion will continue. This growth has resulted in surging demand for warehousing, which has fueled the construction of new warehouses in the Inland Empire. Due to the substantial emissions associated with warehouses, it is critical that land use decisions regarding the siting of warehouses consider air quality impacts when approving new projects. While these decisions are typically made at the local level and South Coast AQMD lacks direct regulatory authority over land use, South Coast AQMD recognizes that collaboration across multiple public agencies and cities is required to promote better land use planning in consideration of air quality impacts*."[14]

I-827.12 Cont.

The March JPA, along with its member agencies the City of Riverside, Moreno Valley, Perris, and the County of Riverside, have cumulatively decided to develop the 215/60 corridor almost exclusively for the Goods Movement Sector in a manner that increases the emissions of regional smog-forming pollution by increasing the numbers of vehicles, trucks, planes, and trains. Each individual decision has significantly and unavoidably degraded air quality and conflicted with the AQMP. Cumulatively, it exhibits a pattern of disregard for the air quality for the region given the overwhelming development of projects that conflict with the air quality management plan and undermine the emissions controls of the individual vehicles by adding so many more trucks and passenger vehicles to the roads, despite our worst in the nation air quality. It also induces additional cargo plane flights and goods-movement via locomotives, which have not been modeled or addressed at all in terms of cumulative air quality impacts.

Therefore, I ask that the March JPA

1) Demonstrate that the Operational Phase Air Quality thresholds of significance are not completely understated when including regionally representative operational emissions for the

[14] AQMP – p.1-5 - http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/04-ch1.pdf?sfvrsn=12

100 million square feet of warehouses already operational and cumulatively impacting air quality. Please account properly for the additional planned/approved warehouses regionally that will add another 50 million square feet of warehouses as shown in Figure 2. This is important for the regional nonattainment of NO_2, ozone, and $PM_{2.5}$ and the estimated cumulative regional impact.

2) Justify the cumulative decisions of itself and its member agencies in continually ignoring the air quality impacts of its decisions and ignoring their responsibilities for managing emissions in the region by making responsible land-use decisions.
3) Identify how its pattern of land-use planning has been responsible and justified regionally in improving the air quality of its residents.

I-827.12 Cont.

Errata

This section includes other observations of errors and questionable assertions by the March JPA and the Project Applicant in its submission.

I-827.13

p.4.2-3 - 2021 data was available as of July 2022 – Table 4.2-1 is out of date.

p.4.2-10 – Table 4.2-3. The new proposed $PM_{2.5}$ 24-hr standard is proposed at 9-10 $\mu g/m^3$ as announced January 6th, 2023[15].

I-827.14

P.4.2-14 – There are a number of omissions from the General Plan Relevant Goals that we think are not being met and would like addressed within this section.

- Add policy 2.3 – Protect the interests of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses
- Goal 3 – Manage Growth and development to avoid adverse environmental and fiscal effects.
    - 3.2 - ….'minimize impacts on natural environmental resources'.
- Transportation Goal 2 – minimizing negative effects on air quality, the environment and adjacent land-uses and jurisdictions
    - Require the installation of bus improvements such as bus turnouts, bus stops, and terminals as part of the conditions of development for employment centers and land uses that attract large numbers of persons, where appropriate.
- Goal 3 - Reduce air pollution through proper land use, transportation, and energy use planning
    - Locate ancillary uses within business and employment centers to reduce VMT
- Goal 4 – Pursue reduced emissions for stationary and mobile sources through the use and implementation of new and advancing technologies
    - Policy 4.1 – Pursue the use of equipment with reduced or zero emissions for stationary and mobile source equipment…
    - Policy 4.4 – Promote for all development and encourage end-uses to employ emission reducing or zero source equipment and processes

I-827.15

[15] https://www.epa.gov/pm-pollution/national-ambient-air-quality-standards-naaqs-pm

    - Policy 4.5 – Promote the development and advancement of reduced and zero emission technologies through R&D
- Goal 5 – Maximize the effectiveness of air quality control programs through coordination with other governmental entities
    - 5.3 - …design transit-oriented development within the planning area
    - 5.5 – provide appropriate mitigation, where necessary
- 6.7 left off – promote ancillary uses to be located with primary uses, such as child care, cafeterias, and other supportive service uses where appropriate
- 9.2 left off – Support the use of efficient street cleaning equipment and practices.

I-827.15 Cont.

p.4.2-15 –

- Fails to mention the Good Neighbor Guidelines City of Riverside, and falsely claims that County of Riverside is consistent with WRCOG. County of Riverside Guidelines are weaker than WRCOG Good Neighbor Guidelines, especially with regards to setbacks from sensitive receptors (300 feet for County, 1,000 feet for WRCOG). Please justify the assertion that these are 'consistent'.

I-827.16

- I request that offroad equipment include 20% of hours of operation to be battery-electric vehicles – these are feasible as shown here: https://californiacore.org/resources/

I-827.17

- PDF-AQ-4 – no natural gas use – why is there a natural gas backbone in Figure 3-7H if PDF-AQ-4 prohibits the use of natural gas in the Specific plan area?

I-827.18

Table 4.2-2 – NO_2 is not listed as being in state nonattainment but is, in fact, in state nonattainment along the SR-60 between San Bernardino and Riverside County.[16] Please justify the failure to disclose this nonattainment area that this project will contribute traffic to from the analysis of nonattainment areas.

I-827.19

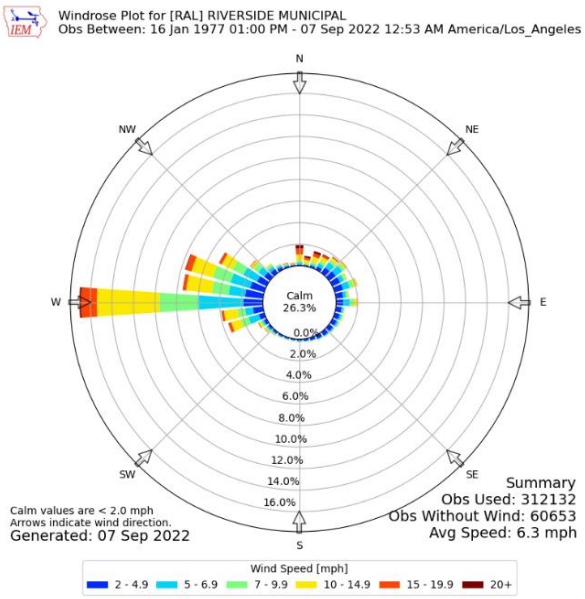
4.2-18 – KRAL is almost 8 miles from the project site and nearly 900 feet lower in elevation – March ARB has meteorological data and is less than 1 mile from the project site. As can be seen from a basic check of the runway orientations for the two airports, KRAL is completely inappropriate for use in meteorological dispersion modeling of this project. Winds at Riverside Municipal are channeled along the Santa Ana river valley east-west – its elevation is 820' ASL. March Air Reserve Base is at 1535' ASL and winds are predominantly north-northwest tosouth-southeast. March Air Reserve Base winds are significantly slower and lower than at RAL, which increases stagnancy and is less effective at dispersion. There is no scientifically valid reason to choose a less representative airport for winds for this project, especially since it will indicate lower pollution impact due to the higher winds and incorrect direction of winds.

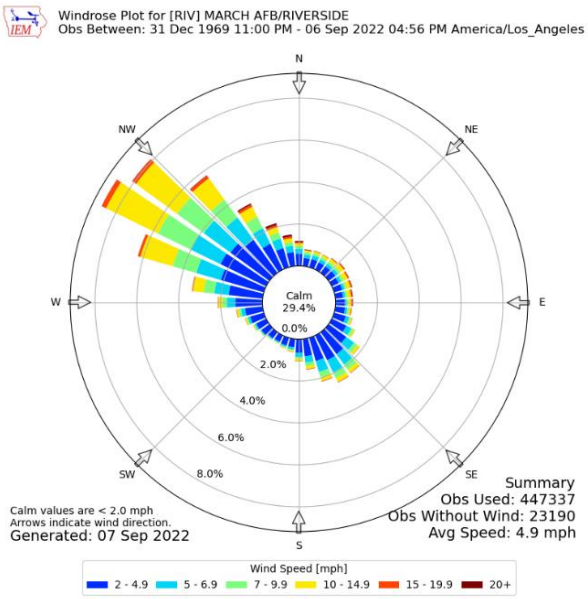
Windroses from Riverside Municipal airport and March AFB – both are fully publicly available as ASOS data here: https://mesonet.agron.iastate.edu/sites/windrose.phtml?station=RIV&network=CA_ASOS

If data from the SCAQMD must be used, the Perris data would be more representative of the local wind field than Riverside Municipal Airport.

I-827.20

[16] https://ww2.arb.ca.gov/sites/default/files/2022-12/no2.pdf





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I-827.20 Cont.

4.2-21 – The current version of AERMOD is 22112 – not 21112 as of June 27, 2022 - https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models

I-827.21

4.2-23 – Trip length of 20.27 miles for BP and fulfilment center uses for LDV and 32.03 miles for the trucks – SCAG average truck trip distances from 2016 are not justified given the location of this warehouse complex to the average warehouses in the SCAG basin. Please justify using average values when this project is much further from the Ports of LA/Long Beach and multimodal facilities than most other warehouses. The Streetlight Data[17] indicate that average truck trip lengths for San Bernardino County are currently at 38 miles per trip as provided by San Bernardino County Transportation Authority. Please justify a SCAG default trip length of 32 miles for these trucks given that SCAG includes areas much closer to the primary ports of entry for these types of uses. A County specific number should be used here.

I-827.22

4.2-24 – PDF-AQ-2 refers to construction phase budget, not cargo-handling equipment. Should this be PDF-AQ-1? Tier 4 CARB equipment is already required throughout the basin and is not a mitigation measure.

I-827.23

p.4.2-25 – MM-AQ-1 affects VOC levels – the South Coast Air Basin is NO_x limited, not VOC limited, so VOC mitigation measures will have no impact at all. NO_x control measures are required to meet NAAQS for ozone and NO_2. This assertion is 20 years out of date.

I-827.24

Table 4.2-9 – PM_{10} and $PM_{2.5}$ background concentrations are omitted from this table which is used as the basis for a 'Less than Significant' impact. However, Riverside Metropolitan stations 1 - Rubidoux list the annual average means and max 24-hr concentration for those pollutants[18]. As the highest background concentration for both pollutants is above the SCAQMD localized significance threshold, the **Threshold of 10.4 μg/m³ is Exceeded and the project would have a Significant and Unavoidable Impact.**

I-827.25

[17] https://www.streetlightdata.com/

[18] https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year

Year	$PM_{2.5}$ 24-hr	PM_{10} 24-hr
2021	82.1 μg/m^3	76 μg/m^3
2020	41.0 μg/m^3	104 μg/m^3
2019	46.7 μg/m^3	99 μg/m^3

I-827.25 Cont.

p.4.2-32 – The boundaries for the construction HRA are inconsistent with the No Trespassing boundaries and project site boundaries for Barton road in the South part of the project. Given the road construction in South Barton the modeling domain needs to include the construction and expansion of asphalt roads at Barton adjacent to the Grove Church. As mentioned in multiple other sections, the construction phase emissions appear to omit other adjacent construction projects and operational truck traffic from the March JPA.

I-827.26

-Again **PDF-AQ-2** is a description of construction phase emissions (**CONSTRUCTION BUDGET)**, not operational cargo handling. The HRA should only apply those project design features listed in the draft EIR in its assumptions. The operational HRA assumption of Less than Significant Impact is not justified here, especially given that the March JPA has not adopted County of Riverside standards.

I-827.27

-There is no mention of induced locomotive or commercial cargo traffic as a result of the cumulative impact of the additional warehouses for this project or in the region. Given that the RTP has no plans to improve the 215/60 interchange, the only way to add goods movement capacity is through additional cargo flights or train transport. Given the community flight path of March ARB commercial planes and the proximity of the rail line, noise and air quality from these alternate goods movement modes are also likely to increase. Please justify not including any induced commercial cargo flights or train trips in this project EIR.

I-827.28

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

R-NOW

Letter I-827

Michael McCarthy
March 9, 2023

I-827.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-827.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. This comment also raises concerns regarding cumulative air quality impacts.

I-827.3 This comment raises generalized concerns regarding the air quality and health risk analysis. Please see the Final EIR and Appendix C-1 for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Final EIR and Appendix C-2 for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. The cumulative air quality impacts were evaluated and were not underestimated. (Appendix C-4) This comment provides the commenter's background information and represents himself as an expert regarding air quality. March JPA has not independently verified the commenter's qualifications and has relied on its expert air quality consultants, whose resumes are attached to Appendix C-4 of this Final EIR.

I-827.4 This comment raises concerns regarding the Project Health Risk Assessment (HRA) Technical Report (Appendix C-2).

a. This comment alleges the Project HRA omits adjacent projects and regionally cumulative truck impacts to I-215. Please see Recirculated Section 4.2, Air Quality, for the revised discussion of cumulative air quality impacts, including along truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. (Appendix C-4)
b. The comment states that the Project HRA omits toxic air contaminants from sources other than DPM. While passenger vehicles would also emit toxic air contaminants, because the passenger vehicle fleet is predominantly gasoline powered, and TAC emission rates from gasoline engines are significantly lower than diesel engine TAC emission rates, the TAC emissions generated by heavy duty trucks result in significantly more risk. As such, no additional substantive health risk impacts would occur as a result of TAC emissions generated by passenger vehicles. Please see Response RA-6.3 for an expanded discussion of gasoline emissions and health risk assessments. Consistent with industry standards, the focus of the HRA is on diesel exhaust as the primary TAC that has the propensity to affect receptors in the vicinity of the Project. All other TACs that may result from passenger vehicles would not generate a greater risk, and in fact, would represent a fraction of the risk for diesel exhaust. Furthermore, the International Agency for Research on Cancer (IARC), which is part of the World Health Organization (WHO), has classified diesel engine exhaust as "carcinogenic to humans" (Group 1) based on sufficient evidence of its carcinogenicity to humans. This classification is in contrast to gasoline engine

exhaust, which is classified as "probably carcinogenic to humans" (Group 2A) due to limited evidence in humans and strong evidence in experimental animals.[1] (Appendix C-4)

c. This comment requests the proposed Park be included as a sensitive receptor site. Please see Recirculated Section 4.2, Air Quality, for the evaluation of the proposed Park as a sensitive receptor. The analysis was revised to include the proposed Park as a sensitive receptor during operation of the proposed Project. As detailed in the Project HRA and Final EIR, the results of the analysis indicate that a less than significant impact would occur for users (including children) of the Park as a result of Project operational emissions. The risk to the Park users would be 1.18 in one million without mitigation and 0.62 with mitigation, both of which are less than the applicable SCAQMD threshold of 10 in one million. Additionally, at this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. The Project HRA contains the model runs and risk calculations. (Appendix C-4)

d. The comment states that the analysis undercounts truck trip rates, DPM emissions, and TRU idling by omitting 'east-side' loading docks for the remaining Industrial parcel. As part of this Project, there are only site plans for Buildings B and C. However, for modeling purposes, the analysis assumed buildings on the remaining parcels and placed dock doors and loading areas in compliance with the development standards in the proposed Specific Plan. The number of idling trucks and TRUs is based on the Project Traffic Analysis and the building square footage, not the number of loading docks, thus the number of loading docks or dock doors would not affect the analysis. The comment makes the inaccurate assumption that the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would be two separate buildings on the remaining industrial parcel. The modeling assumed 3 industrial buildings – Buildings B and C and one on the remaining industrial parcel. (Appendix C-4)

   The analysis accounts for the possibility that, while the allowed square footages on each parcel would remain the same, the ultimate uses (cold storage or high-cube fulfillment) could shift. The Project HRA is consistent with the Project Traffic Analysis, which only breaks out truck trips for Buildings B and C (both of which have proposed site plans). The remaining truck trips are split between high-cube cold storage warehouse, remaining industrial: high-cube fulfillment, business park warehouse, and business park mixed-use land uses. Additionally, because it is not known at this time in which buildings the high-cube cold storage warehouse uses would be placed, these truck trips were allocated between Buildings B, C, and the one building on the remaining industrial parcel based on the square footage for each building, proportional to the overall cold storage space allowed. As such, it is expected that the truck trip rates vary for each building based on the intended use of the building and allocation of cold storage trips. The analysis accounts for all daily truck trips identified in the analysis, and the manner in which these are apportioned between the various buildings would not alter the results of the analysis. (Appendix C-4)

e. Please see Response I-827.4.b above as well as Recirculated Section 4.2, Air Quality, and Appendices C-1 and C-2 for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. (Appendix C-4)

[1] https://www.iarc.who.int/wp-content/uploads/2018/07/FAQ_English-Mono105-1.pdf

I-827.5 This comment raises concerns regarding cumulative air quality impacts. Air pollution by nature is largely a cumulative impact. The cumulative geographic context for air quality impacts is the SCAB. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Appendix G of the CEQA Guidelines indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the significance determinations. SCAQMD has developed regional significance thresholds for some regulated pollutants. March JPA has relied on these significance thresholds to make significance determinations for the Project's air quality impacts.

SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicates that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. The potential for the Project to result in a cumulatively considerable impact, specifically a cumulatively considerable new increase of any criteria pollutant for which the Project region is nonattainment under an applicable NAAQS and/or CAAQS, is addressed in Section 4.2.5, Impacts Analysis. As set forth therein, because the Project would exceed the project-level thresholds for regional VOC, NOx, CO, and PM10, and PM2.5 emissions during operation, the Project's cumulative impacts with respect to such emissions would be considerable and significant. Please see Recirculated Section 4.2, Air Quality, for an expanded discussion of cumulative air quality impacts.

I-827.6 This comment raises concerns regarding cumulative health risks.

a. This comment states the Project HRA omits nearby existing and under construction warehouses. Please see Recirculated Section 4.2, Air Quality, for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.
b. This comment states the Project HRA omits analysis of the Project's truck routes. Please see Recirculated Section 4.2, Air Quality, for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.
c. This comment states the HRA omits the construction of South Barton Road. As shown in revised Exhibit 2-A of the Project HRA, the analysis placed construction sources within 80 feet of the Grove Preschool (represented by Receptor R8), and the modeling conservatively assumed that construction would occur at these locations for the entire 4.35-year duration of Project construction, although construction on the southern Barton extension adjacent to the preschool would take place over a significantly shorter period of time. (Appendix C-4)
d. This comment states the HRA omits the construction of the reclaimed water tank. As shown on the revised Exhibit 2-A of the Project HRA, the closest sensitive receptor (Receptor 11) is 32 feet from construction activities, specifically the northern Barton Street extension and the Mixed Use parcels of the Specific Plan Area. Even with analyzed exposure of 4.35 years of construction emissions, the mitigated construction health risk at Receptor R11 is 0.56 in one million, well below the SCAQMD significance threshold of 10 in one million. As noted in the Final EIR and Project HRA, TACs generally dissipate with distance from the source. The homes along Grove Community Drive and Barton Drive in the vicinity of the offsite water tank construction and waterline installation would not be exposed to construction source emissions to the extent or duration compared to Receptor R11 – _the mitigated construction health risk

would be below 0.56 in one million. Offsite construction would occur over a significantly shorter duration than construction of the Project itself. As such, since the mitigated construction health risk at Receptor R11, the maximally exposed individual receptor (MEIR), is well below the SCAQMD significance threshold, the Project will not cause a significant human health or cancer risk to nearby residences from any on-site or off-site construction activity. (Appendix C-4)

I-827.7 This comment raises concerns regarding the analysis in the Project Health Risk Assessment. The Project HRA analyzes impacts from all construction and operational activities. While 50% of cancer risk in the basin may be attributed to DPM emissions, this does not mean that the remaining 50% is attributable to passenger vehicle emissions as stated in the comment. Stationary sources, including power plants, refineries, manufacturing facilities, boilers, and gas stations are also significant contributors to basin-wide cancer risk. As such, the analysis does not significantly underestimate risk as stated in the comment. Additionally, please see Response RA-6.3, which explains the contribution of toxics from gasoline vehicles.

I-827.8 This comment requests the proposed Park be included as a sensitive receptor in the Project Health Risk Assessment analysis. Please see Recirculated Section 4.2, Air Quality, for the evaluation of the proposed Park as a sensitive receptor. The analysis has been revised to include the proposed Park as a sensitive receptor during operation of the proposed Project. As detailed in the Project HRA and Final EIR, the results of the analysis indicate that a less than significant impact would occur for users (including children) of the Park as a result of Project operational emissions. The risk to the Park users would be 1.18 in one million without mitigation and 0.62 with mitigation, both of which are less than the applicable SCAQMD threshold of 10 in one million. Additionally, at this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. The Project HRA contains the model runs and risk calculations.

I-827.9 This comment questions the modeling in the Project Health Risk Assessment.

a. This comment states the Project HRA uses an outdated Project site plan and questions the placement of dock door locations for the remaining Industrial parcel. As noted by the comment, the health risk assessment in the Draft EIR evaluated 1,763,168 square feet of business park use on seven business park parcels. After the original analysis was run, the site plan was changed slightly to distribute the same square footage of business park use onto 10 separate parcels. The Recirculated EIR disclosed the unmitigated operational health risk would be 5.26 in one million at the MEIR (R3). In response to recirculation comments, the Project HRA was revised to analyze warehouse buildings on each of the 10 Business Park parcels. The Project HRA confirms that the unmitigated operational risk was reduced from 5.26 in one million to 4.55 in one million as a result of this change. (Appendix C-4)

   The comment further questions the analysis's placement of loading docks for the remaining Industrial parcel. There is currently no site plan proposed for the remaining Industrial parcel and the source configuration is simply conceptual for analytical purposes and shows loading docks on the northern and southern side of this modeled area in compliance with the development standards in the proposed Specific Plan. Emissions from on-site idling and on-site travel were included for the entirety of the Specific Plan Area. Notwithstanding, even if the configuration of the loading docks were different, there would be no change in the risk calculations due to the distance to the nearest receptor locations. (Appendix C-4)

b. This comment questions the distribution of truck trips among Buildings B, C, and the remaining Industrial parcel. The comment assumes the remaining Industrial parcel would consist of a building with 725,000 square feet of high-cube warehouse and 500,000 square feet of cold storage warehouse uses. The truck trip estimates provided in Table 4.15-1 of the Draft EIR only break out truck trips for Buildings B and C, both of which have proposed site plans, and the remaining truck trips are split between high-cube cold storage warehouse, remaining industrial: high-cube fulfillment, business park warehouse, and business park mixed-use land uses. The analysis accounts for the possibility that, while the allowed square footages on each parcel would remain the same, the ultimate uses (the cold storage or high-cube fulfillment) could shift Because it is not known at this time in which buildings the high-cube cold storage warehouse uses would be placed, these truck trips were allocated between Buildings B, C, and the one building on the remaining Industrial parcel based on the square footage for each building, proportional to the overall cold storage space allowed. As such, it is expected that the truck trip rates vary for each building based on the intended use of the building and allocation of cold storage trips. As such, a total of 418 truck trips were assigned to the remaining Industrial parcel (276 trips from the remaining industrial: high-cube fulfillment use and 142 trips from the high-cube cold storage warehouse land use). Additionally, TRU usage was assumed to take place at Buildings B, C, and the remaining Industrial parcel based on the cold storage truck trips assigned to each building. Because all truck trips presented in Table 4.15-1 are accounted for in the HRA analysis, diesel particulate emissions were not undercounted in the analysis. The analysis accounts for all daily truck trips identified in the analysis, and the manner in which these are apportioned between the various buildings would not alter the results of the analysis. (Appendix C-4)

c. This comment questions the use of ITE truck trip rates rather than SCAQMD Rule 2305 truck trip rates and suggests the DPM emissions are understated. Please see Response FL-B.7 detailing the development and intended application of the Rule 2305 weighted average truck trip rates. The analysis utilized truck trips presented in the Project traffic study (Table 4.15-1 of the Draft EIR) and more accurately represents the specific land uses proposed by the Project. As such, DPM emissions from trucks are not understated in the analysis.

d. This comment suggests the Project HRA incorrectly allocated truck trips and locations among Buildings B, C, and the remaining Industrial parcel. Please see Responses I-827.9.a and I-827.9.b above. Additionally, as Appendix C-2 footnotes, “Exhibit 2-B visually overstates the extent of warehousing allowed in the mixed-use parcels within the Project’s Specific Plan so as to evaluate the ‘worst-case’ impacts at each sensitive receptor.” As shown, the Project’s HRA’s modeling is overly conservative and currently overstates the potential loading docks and trucking activity that are expected to occur on-site.

e. This comment states the Project HRA omits analysis of the Project’s truck routes. Please see Recirculated Section 4.2, Air Quality, for expanded discussion and analysis of cumulative health risk impacts, including along the Project’s truck routes, and cumulative cancer risk utilizing the U.S. EPA’s threshold of 100 in one million.

I-827.10 This comment summarizes previous comments regarding the Project Health Risk Assessment.

1) This comment questions the omission of nearby approved and planned projects from the construction phase HRA analysis. There are several valid reasons why nearby approved and planned projects are not included in the construction phase HRA analysis:
    a. Uncertain Construction Timing and Duration: The specific timing and duration of nearby approved and planned projects may not be known or could be subject to change. Since health risk assessments are time-sensitive and construction schedules can be fluid, it would be inappropriate to speculate on the stacking of risks without accurate information. Risk assessments need to be based on concrete data and reliable projections.
    b. Source-Receptor Relationship: Health risk assessments are typically conducted based on a source-receptor relationship, where the emission source (e.g., diesel construction equipment) and the exposed receptor (e.g., residential area or sensitive population) are well-defined and quantifiable. Including nearby projects that are in various stages of approval or planning could introduce uncertainties in identifying the specific emission sources and receptors relevant to the assessment.
    c. Variability in Source-Receptor Location: The location of receptors (e.g., residential areas, schools, workers) in relation to different emission sources can vary significantly. Each construction project may have a unique spatial distribution of potential receptors, and the stacking of risks without precise data could lead to misleading conclusions. Relying on speculative assumptions could undermine the accuracy and reliability of the health risk assessment.

    As such, omitting nearby approved and planned projects from the construction phase diesel HRA is a prudent approach to ensure the assessment remains accurate, focused, and compliant with regulatory requirements. The potential uncertainties and speculative nature of including such projects could undermine the reliability and relevance of the assessment's findings. Instead, assessments should be based on available data and established source-receptor relationships for the specific construction project under consideration.

2) This comment states the Project HRA omits analysis of the Project's truck routes. Please see Recirculated Section 4.2, Air Quality, for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.
3) This comment states the Project construction HRA should have included existing operational warehouse impacts. Please see Response I-827.10.1, above, as the reasoning provided also applies to existing operational warehouse impacts.
4) This comment states the Project HRA omits known mobile source related pollutants. The HRA does not omit known mobile source related pollutants from the HRA. Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. See Response RA-6.3, which discusses why health risk assessments focus on diesel DPM.
5) This comment requests the proposed Park be included as a sensitive receptor in the Project Health Risk Assessment analysis. Please see Recirculated Section 4.2, Air Quality, for the evaluation of the proposed Park as a sensitive receptor. The analysis was revised to include

the proposed Park as a sensitive receptor during operation of the proposed Project. As detailed in the Project HRA and Final EIR, the results of the analysis indicate that a less than significant impact would occur for users (including children) of the Park as a result of Project operational emissions. The risk to the Park users would be 1.18 in one million without mitigation and 0.62 with mitigation, both of which are less than the applicable SCAQMD threshold of 10 in one million. Additionally, at this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. The Project HRA contains the model runs and risk calculations.

6) This comment summarizes prior comments regarding truck trips and TRU emissions modeling. Please see Response I-827.9, above.
7) This comment suggests the Project HRA should have included trails and passive recreation areas as sensitive receptors as a possible location for micro-exposures. Air quality sensitive receptor locations are places where people spend significant amounts of time and are, therefore, more vulnerable to potential air pollution exposure. Walking trails and recreational areas are typically not considered sensitive receptor locations for several reasons, one of which is the minimal time spent by individuals at these places. People typically visit walking trails and recreational areas for short periods, often for leisure or exercise purposes. Unlike residential or workplace locations where individuals spend a considerable portion of their day, the time spent on walking trails and recreational areas is limited. As a result, the potential exposure to air pollution is significantly reduced compared to sensitive locations where people reside or work. The LST analysis in Recirculated Section 4.2, Air Quality, evaluates potential short-term or micro exposures to criteria air pollutants and determined that impacts were less than significant.

I-827.11 This comment summarizes previous comments regarding cumulative air impacts.

1) This comment questions the exclusion of construction emissions from nearby approved and planned projects. Please see Response I-827.10.1, above, as the reasoning provided also applies to cumulative construction emissions.
2) This comment questions the exclusion of existing operational emissions from Project air quality and HRA construction phase analysis. Please see Response I-827.10.1, above, as the reasoning provided also applies to existing operational emissions during the Project construction phase.
3) This comment questions the Project construction phase significance determinations in relation to nearby construction emissions and existing operational emissions. Please see Responses I-827.11.1 and I-827.11.2, above.

I-827.12 This comment raises concerns regarding operational air quality thresholds of significance and cumulative air quality impacts. The comment questions the EIR's cumulative project list. Please see Topical Response 7 – Cumulative Projects, for an explanation of the development of the EIR's cumulative project list. The comment further describes the public agency responsibilities for improving regional air quality. The comment also characterizes the land use decisions of March JPA and its member agencies.

1) This comment states the EIR understated the operational phase air quality thresholds. Please see Recirculated Section 4.2, Air Quality, for additional operational phase analysis and expanded discussion of cumulative air quality impacts.

2) This comment states March JPA and its member agencies ignore cumulative air quality impacts. Please see Recirculated Section 4.2, Air Quality, for an expanded discussion of cumulative air quality impacts and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.
3) This comment requests a discussion of the appropriateness of March JPA's land use decisions as it relates to regional air quality. This comment is outside the scope of CEQA and does not relate to the adequacy of the EIR. Over the years, the region has shown significant improvement in air quality. While there may be multiple factors contributing to this improvement, land use planning has played a crucial role in positively impacting air quality and justifying regional improvements for its residents. Some of the key aspects and measures that have been employed by March JPA include:
    a. Smart Growth and Compact Development: Land-use planning has emphasized the development of compact urban centers, encouraging mixed land uses, and reducing urban sprawl. This strategy helps reduce the need for long commutes and encourages active transportation, such as walking and cycling, thereby lowering vehicular emissions.
    b. Improvement of Public Transportation: The region has invested in enhancing and expanding public transportation networks, including buses, trains, and light rail systems. By providing viable alternatives to driving, this strategy reduces the number of vehicles on the road and subsequently cuts down on emissions.
    c. Promotion of Active Transportation: Land-use planning has prioritized the creation of pedestrian-friendly and bike-friendly infrastructure, encouraging residents to opt for walking or cycling for short trips. This reduces the number of short car journeys, which are typically less fuel-efficient and more polluting.
    d. Green Spaces and Urban Forestry: Creating and maintaining parks, green spaces, and urban forests can help absorb pollutants and improve air quality. Land-use planning has incorporated the development and preservation of such areas to mitigate the impact of air pollution.
    e. Energy-Efficient Buildings: Implementing regulations and guidelines for energy-efficient buildings helps reduce energy consumption and subsequently lowers emissions from power plants and other energy sources.

    By adopting and implementing these land use planning strategies, the South Coast Air Basin and March JPA have taken significant steps to improve air quality and create a healthier living environment for its residents. The regional justification for these improvements lies in the substantial evidence linking air pollution to various health issues, including respiratory diseases, cardiovascular problems, and other adverse health impacts. Reducing air pollution not only enhances the quality of life for residents but also contributes to long-term economic benefits by lowering healthcare costs and increasing overall productivity. Moreover, improved air quality can attract businesses and tourists to the area, boosting the local economy while fostering a sustainable and environmentally conscious community.

I-827.13 This comment states that the air quality data provided in Table 4.2-1 is out of date as it does not include 2021 data. Please see Recirculated Section 4.2, Air Quality, which includes 2021 data.

I-827.14 This comment states that the $PM_{2.5}$ 24-hour standard presented in Table 4.2-3 is outdated. However, the proposed $PM_{2.5}$ standard of 9-10 micrograms per cubic meter was released on January 6, 2023, and has yet to be adopted.

I-827.15 This comment lists goals and policies from the March JPA General Plan that are not identified in Recirculated Section 4.2, Air Quality, and asserts that these goals and policies are not being met.

- The comment requests that Policy 2.3 – "Protect the interests of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses" be added. Policy 2.3 in the Land Use Element of the General Plan is as follows: "Support land uses that provide a balanced land use pattern of the Planning Area, and discourage land uses that conflict or complete with the services and/or plans of adjoining jurisdictions." The analysis within Section 4.10, Land Use and Planning, includes an evaluation of the Project's consistency with land use goals and policies adopted specifically for the purpose of mitigating an environmental impact, consistent with Threshold LU-1.
- Land Use Element Goal 3 and Policy 3.2 - Please see Recirculated Section 4.10, Land Use and Planning, for the consistency analysis with Goal 3 and Policy 3.2.
- Transportation Element Goal 2 – Please see Recirculated Section 4.10, Land Use and Planning, for the consistency analysis with Goal 2.
- Air Quality Element Goal 3 – Please see Recirculated Section 4.10, Land Use and Planning, for the consistency analysis with Goal 3.
- Air Quality Element Goal 4 – Please see Recirculated Section 4.10, Land Use and Planning, for the consistency analysis with Goal 4.
    - Policy 4.1 – The Project is consistent because MM-AQ-18 requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed.
    - Policy 4.2 – Please see response to Policy 4.1, above.
    - Policy 4.5 - Please see response to Policy 4.1, above.
- Air Quality Goal 5 – Please see Recirculated Section 4.10, Land Use and Planning, for the consistency analysis with Goal 5.

- Policy 5.3 - Please see Recirculated Section 4.10, Land Use and Planning, for the consistency analysis with Transportation Element Goal 2, which would also apply to Policy 5.3.
- Policy 5.5 –The Project is consistent because Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27.
- Policy 6.7 – The Project is consistent because Table 3-1 of the proposed Specific Plan identifies ancillary uses allowed in each land use designation. For example, Food and Beverage Sales may be an ancillary use in the Industrial zone.
- Policy 9.2 – The Project is consistent because MM-AQ-23 requires the facility operator to periodically sweep the property, including parking lots and truck courts, to remove road dust, tire wear, brake dust, and other contaminants. Under the proposed Specific Plan, street sweeping within the Specific Plan Area will be done by the LLMD.

I-827.16 This comment questions the omission of the City of Riverside's Good Neighbor Guidelines. The comment further questions the consistency determination regarding the County of Riverside's Good Neighbor Guidelines. Please see Recirculated Section 4.2, Air Quality, for an updated discussion of the City and County Good Neighbor Guidelines. As detailed in Recirculated Section 4.10, Land Use and Planning, the Project is consistent with the Good Neighbor Guidelines for the County of Riverside. The Project's consistency with the City of Riverside Good Neighbor Guidelines is discussed in Topical Response 4 – Project Consistency. The purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses.

I-827.17 This comment requests battery-electric vehicles comprise 20% of offroad equipment hours. Regarding construction, MM-AQ-1 requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. Recirculated Section 4.2, Air Quality, and the Revised Air Quality Impact Analysis (Appendix C-1) determined the Project would have less than significant construction air quality impacts with implementation of MM-AQ-1 through MM-AQ-4. Additional mitigation is not required for construction air quality impacts.

For operation, MM-AQ-18 requires all cargo handling equipment to be electric and requires tenant lease agreements include this restriction.

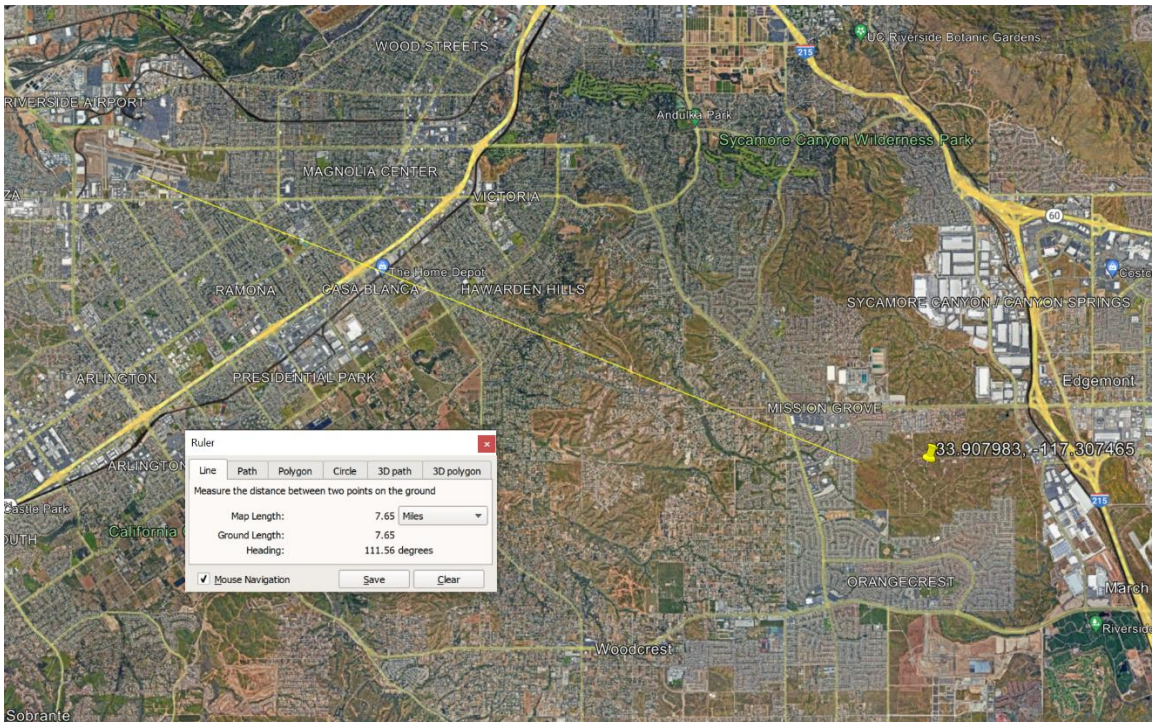
The comment cites to the Clean Off-Road Equipment Voucher Incentive Project (CORE) website. "The CORE Project was established to reduce price barriers, enabling users to adopt more zero-emission equipment. Created by the California Air Resources Board (CARB) in 2017, CORE provides point-of-sale discount vouchers that reduce the purchase cost of equipment operated in California." This website does not indicate that it is feasible that offroad construction equipment can include 20% of hours of operation to be battery-electric vehicles.

I-827.18 This comment questions the installation of a natural gas backbone when the Project will not use natural gas. SoCal Gas, as a public utility, will be notified prior to the start of construction and offered the opportunity to install a natural gas backbone within public roadways; however, the Project will not connect to it.

I-827.19 This comment states that the analysis fails to disclose that route SR-60 between San Bernardino and Riverside Counties is in nonattainment for NO_2. The Project site is not located within this nonattainment area and is in fact located in an attainment area for NO_2. Please see Recirculated Section 4.2, Air Quality, which includes this information.

I-827.20 This comment states that the use of meteorological data from Riverside is not appropriate and recommends the use of data from March ARB or Perris. Meteorological data from the SCAQMD's Riverside monitoring station was utilized as this represents the nearest monitoring station to the Project site. As shown below, the Riverside monitoring station is located approximately 7.65 miles from the Project site, while the Perris Valley monitoring station is located approximately 8.30 miles from the Project site. SCAQMD does not provide meteorological data for March ARB. Data from SCAQMD's Perris monitoring site was not used as this location is further from the Project site. Additionally, the Riverside monitoring station is located in the same source receptor area as the Project (SRA 23) and is closer to the Project, while the Perris monitoring station is located in a different source receptor area (SRA 24) and is farther away. SCAQMD's jurisdiction is divided into several SRAs which reflect areas with similar topography, meteorological conditions, and air quality.

Riverside Monitoring Station (7.65 miles):



Perris Valley Monitoring Station (8.30 miles):



I-827.21 This comment states that the analysis used AERMOD version 21112 rather than 22112. As revised, the Project HRA used Lakes AERMOD View (Version 11.2.0) to calculate annual average particulate concentrations associated with site operations. Lakes AERMOD View incorporates EPA's AERMOD Version 22112.

I-827.22 This comment states that the trip distances utilized in the analysis are not appropriate. The passenger vehicle trip lengths utilized CalEEMod defaults, which are based on data from the local Metropolitan Planning Organization/Regional Transportation Planning Agency. Truck trip lengths are based on guidance from SCAQMD in the Rule 2305 Second Draft Staff Report, which recommends the use of a 14.2-mile trip length for class 4-7 trucks (LHDT1/2, MHDT) and 39.9 miles for class 8 trucks (HHDT). As such, a weighted average truck trip distance of 32.03 miles was used based on the assumed fleet mix.

I-827.23 This comment identifies a typographical error on p. 4.2-24. Recirculated Section 4.2, Air Quality, corrects this error.

I-827.24 This comment states that MM-AQ-1 affects VOC levels, and because the South Coast Air Basin is NO_X limited this would have no impact. As discussed in Recirculated Section 4.2, Air Quality, and the Project Air Quality Impact Analysis (Appendix C-1), the Project's unmitigated construction emissions would exceed the SCAQMD threshold for VOC and NO_x. Implementation of MM-AQ-1 through MM-AQ-4 would reduce the Project's VOC and NO_x emissions during construction to less than significant levels.

I-827.25 This comment states that Table 4.2-9 should add PM_{10} and $PM_{2.5}$ background concentrations, which would cause the threshold of 10.4 micrograms per cubic meter to be exceeded. However, based on SCAQMD's Localized Significance Threshold Methodology, background concentrations should only be considered for CO and NO_2[2]. As such, consistent with SCAQMD's methodology, the analysis in Recirculated Section 4.2, Air Quality, did not consider background concentrations of PM_{10} and $PM_{2.5}$ when determining if the applicable localized significance threshold had been exceeded. In addition, please see the Project HRA, which explains that health risk impacts from construction of the Project would be well below the project level SCAQMD threshold of 10 in one million.

I-827.26 This comment states that the boundaries for the construction HRA are inconsistent with the no trespassing boundaries and Project site boundaries for Barton Street. Regarding construction of the Barton Street southern extension, please see Response I-827.6.c, above. The comment further references previous comments related to adjacent construction projects and operational truck traffic. Please see Response I-827.10, above.

I-827.27 This comment identifies a typographical error and states construction budget project design feature should not be included in the Project HRA. Please see Recirculated Section 4.2, Air Quality, which revises the typographical error and includes discussion and analysis of diesel-powered cargo equipment and implementation of MM-AQ-18.

I-827.28 The comment states that the analysis does not mention any induced locomotive or commercial cargo traffic. The Project site is not served by any rail lines nor is any portion of March JPA or March Air Reserve Base/Inland Port. Because the March ARB/Inland Port Airport is a joint use airport, civilian flights, including commercial cargo flights, are limited through a Joint Use Agreement between the March JPA and the U.S. Air Force.[3] Additional flights can only be approved after environmental review of an airport operating agreement through CEQA.[4] No additional flights are proposed as a part of this Project.

[2] See Pages 2-5 and 2-8 of the *Final Localized Significance Methodology (2008)* which can be found: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

[3] https://www.marchjpa.com/documents/docs_forms/joint_use_agreement.pdf

[4] https://marchjpa.com/wp-content/uploads/2022/05/MIP-Carrier-req-for-Operational-status-instructions-2021.pdf

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From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Thursday, March 9, 2023 8:13 AM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: GHG.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). I-828.1

Attached please find a comment on the greenhouse gas section of the draft EIR.

Please email me to confirm receipt of this public comment.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation area; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

I-828.2

The draft EIR Greenhouse gas section (section 4.7 and appendix I) fails to accurately consider the full greenhouse gas emissions impacts of the Project. Multiple errors and omissions undermine the draft EIR findings that the project will not create a significant and unavoidable impact on greenhouse gas emissions for GHG-1 and GHG-2 thresholds of significance. This GHG chapter is a bizarro dystopian version of climate change adaptation and greenhouse gas mitigation for a project entirely built around bad land-use that is unwalkable, unsafe to bike next to, and generate 35,000 daily vehicle trips from outlying areas where warehouse workers can afford to live.

1) The project completely omits the CO_2 emissions associated with concrete foundations and building materials in its analysis. Each cubic yard of concrete (~1 ton of concrete) emits ~180 kg CO_2 emissions, which is about 400 pounds of CO_2. Assuming the average concrete slab for a warehouse is 6 inches thick, the calculation for one acre of concrete is 43560 feet/acre * 0.5 feet thick * 27 cubic feet/yard * 400 pounds of CO_2/cubic yard of concrete = 161 tons of CO_2/acre slab. Concrete slab foundations for 288 acres of warehouses and roads will likely emit 46,000+ tons of CO_2 into the atmosphere. Note that this estimate will increase the project CO_2 estimates in Table 4.7-7 of 93,000 tons by almost 50% and therefore the project has significantly underestimated its greenhouse gas emissions by omitting building materials for foundations, much less the buildings themselves. The cumulative impacts of warehouses on our region have been completely omitted from CEQA analyses to date and there are currently over 6,500 acres of warehouses built and another 4,300 acres approved/under construction/and in various planning phases. The cumulative impact of these warehouse slabs is 1.6 million tons of CO_2 added to the atmosphere that hasn't been accounted for regionally.

I-828.3

2) Project VMT projections are based on flawed estimates of VMT per worker trip that assume workers are available locally (within 12 miles) to work at these warehouses. As described in the

I-828.4

jobs/housing/population letter, the current unemployment rate in the Inland Empire is 3.7%[1], literally the lowest value ever recorded in the 33 years of available data collected at a county level. There are approximately 650,000 residents within 12 miles of this project, of whom approximately 50% are of working age (16-67) and in the labor force. Apply some basic math and the number of unemployed workers within 12 miles of this project is currently 11,000. Cumulatively, there are over 50,000 jobs expected from the approved World Logistics Center[2] (35,000+ jobs), Stoneridge Commerce Center[3] (10,000+ jobs) and other approved and planned warehouses in the region as shown in **Figure 1**. Therefore, we assert that the 2,600 workers estimated for this project don't exist locally and will have to commute from other areas where housing is cheaper to work here. There are plenty of existing warehouses that provide jobs, but very little local jobs that pay sufficient wages to work locally. Therefore, this project will NOT reduce VMT but will, in fact, increase it through increased VMT for local residents (who must commute long distances to find above-average paying jobs) and the workers for this project who must commute from Hemet or beyond to find affordable housing on typical warehouse wages ($18.75/hr). Given these clear indications that the area is job rich and housing poor, as fully documented in the jobs housing population comment letter, I ask that the VMT calculations account for actual employment numbers as of December 2022, the most recent prior to draft EIR release.

I-828.4 Cont.

3) The greenhouse gas VMT/employee CO_2 emissions calculations do not account for autonomous trucks, delivery vehicles or future automation of warehouse jobs. A sensitivity study is needed to adequately calculate build-out year CO_2/employee emission rates based on a high-automation future in 2045 where autonomous trucks and delivery vehicles emit pollution but yield no jobs. Currently, the jobs section provides no description of how the jobs numbers are estimates, nor what the types of jobs might be, so it is impossible to analyze how they might be affected by possible automation trends in the 2045 build out year.

I-828.5

4) The greenhouse gas section Table 4.7-4 – Climate Action Plan Consistency claims 160 points of credit for EV charging 'stations'. Given that the project includes 20 individual parcels (4 industrial after Building A is split, 10 business-park, 6 mixed-use), claiming 20 credits for a single charging station per building does not pass the laugh test. Each of the other uses is applied to ALL buildings (e.g., insulation, cool roof, water efficient toilets) but the charging station credit does not apply on a per building basis (i.e., one credit for one station per building). The 20 stations will need to supply the majority of 35,000 daily trips when combustion vehicles are phased out in 2035 by CARB regulations. For example, if this project was simply one warehouse, rather than 20 building complex, it would be able to claim 160 points, but as 20 buildings in a complex it cannot claim credits disproportional to the number of buildings and vehicles served. Therefore, this credit should be 8 points (160/20 = 8), not the 160 points claimed. Therefore the project has only achieved a total score 74 points, rather than the 100 point minimum necessary to achieve climate action plan consistency. Therefore, it is a **Significant Impact** with insufficient mitigation and consistency with climate action plan goals.

I-828.6

[1] [1] https://fred.stlouisfed.org/series/CARIVE5URN

[2] https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32

[3] v_DUvTq0wy7zyk_ATUd1e_ywhJKJznH0Y5OLgU21nc43u6Hte84WB6Ia_vn9Rnu3c3NsFZDe9vF_31qm0 (ca.gov) – pS-63

5)

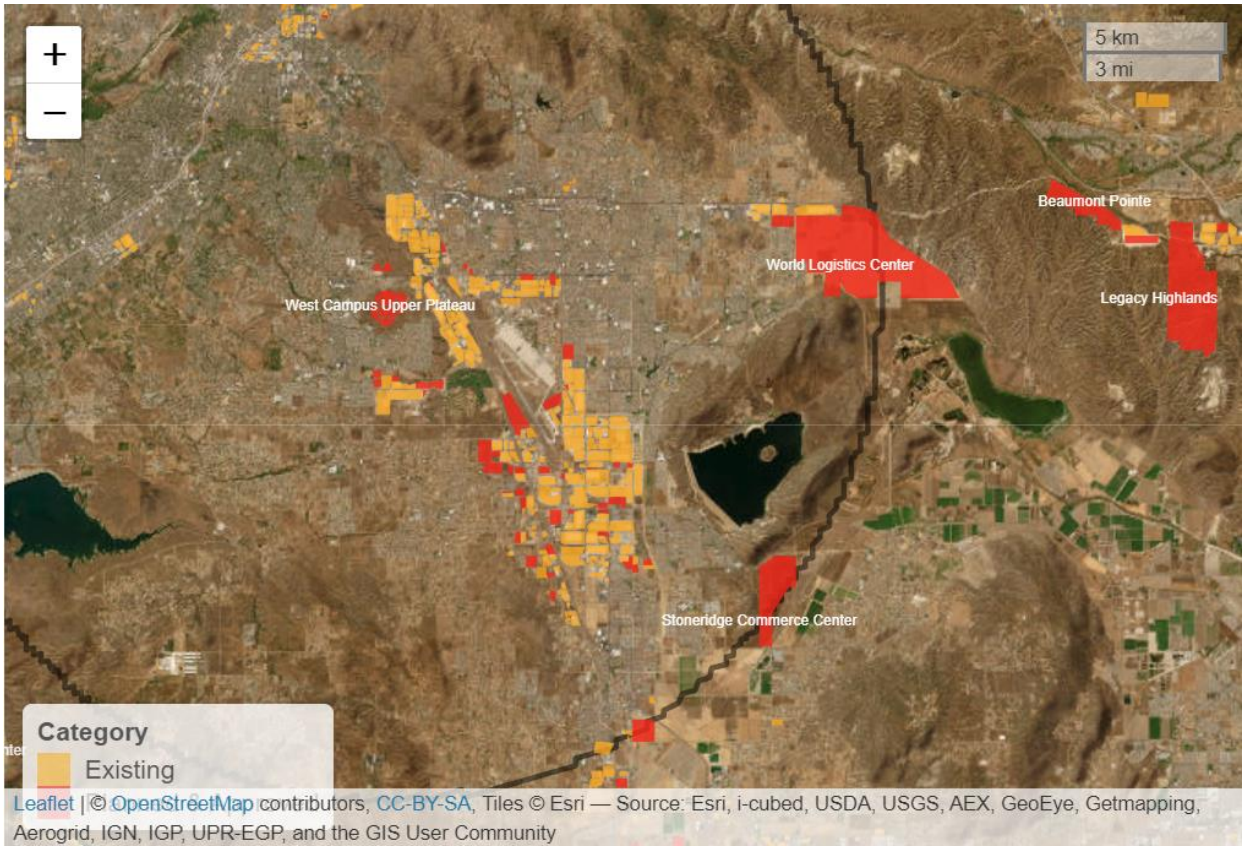


Figure 1. Existing warehouses (brown) and approved/planned warehouses (purple) in the 215/60 corridor region within the 12 mile radius of the project VMT estimates.

Finally, I note that the mitigation measures are completely inadequate. MM-GHG-1 should be increased to at least 70% of building power requirements from solar. MM-GHG-7 should require one EV charging station per 200 vehicle trips – 175 charging stations. Additionally, it should include at least 20 heavy-duty truck chargers (one per every 100 truck trips).

Additional GHG mitigation measures that should be included are:

- Require the March JPA to ensure that all construction and operational requirements meet or exceed the County of Riverside GHG requirements, since the March JPA will be handing over enforcement and compliance responsibilities to the County prior to project opening and will be responsible for overseeing and enforcing construction phase activities for a minimum of 60% of the construction period (2025-2028).
- Require 25% of all off-road construction vehicles in each class or as a fraction of total CO2 emissions to be battery-electric.
- Require low CO_2 concrete for the foundations and roads (less than 250 pounds of CO_2 per cubic yard)
- Require low albedo roads and roofs to reduce reflectivity and urban heat island effect
- Require roofs that do not include solar panels to be covered in vegetation to reduce urban heat island, sequester CO_2, and mitigate the air quality impacts of truck pollution

I-828.7

- Require 50% of tenant owned passenger vehicles by tenants that visit the West Campus to be battery-electric in the 2028 opening year and 100% to be battery-electric by 2030.
- Require 25% of tenant owned trucks that visit the West Campus to be battery-electric in the 2028 opening year and 100% to be battery-electric by 2035.
- Require 25% of trucks visiting the West Campus owned by subcontractors owning over 10 trucks to be battery-electric in the 2028 opening year and 100% to be battery-electric by 2035.

I-828.7 Cont.

Lastly, the climate change section notes that China is the largest emitter of carbon dioxide emissions in Table 4.7-2, nearly doubling the US emissions annually. However, the United States has outsourced the manufacturing of our goods to China, and thus outsourced our CO_2 emissions to that country as well. It is ironic that this warehouse complex project is entirely based around imports from China and other nations in a global supply chain that irresponsibly emits greenhouse gases in every steps of the goods movement industry. Goods are manufactured in China, shipped by rail/train/boat to the ports, where they are shipped by dirty ocean-going vessels across the Pacific. In the Ports of Los Angeles and Long Beach, the drayage trucks then take a 71 or 67 mile trek to the March JPA, emitting 2.44 pounds of CO_2 and a few milligrams of diesel PM for each mile they go.

I-828.8

Our planet is at a tipping point in the climate crises and the banality of corporations like the Lewis Group that put forward weak and backwards-looking projects that will contribute to climate change with zero effort to do anything positive, innovative, or even responsible in its mitigation efforts is astoundingly cynical. Randall Lewis is a philanthropist who has funded multiple centers for sustainability at education institutions throughout the region. That his name is associated with a project that is this blatantly terrible in climate impacts is a stain on his legacy within the Inland Empire.

Please justify this project as being responsive to the climate change impacts in any meaningful way. Please try to be a leader and propose real mitigation that will help our region respond to the threats facing our planet responsibly.

I-828.9

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

R-NOW

Letter I-828

Michael McCarthy
March 9, 2023

I-828.1 This comment is introductory and refers to an attached letter. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-828.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

I-828.3 This comment requests the Draft EIR analyze CO_2 emissions associated with concrete foundations and cumulative impacts. GHG emissions resulting from the pouring of concrete and building materials were not included in the analysis as it is not known the quantities and types of concrete and other materials that would be used, and it would be speculative to estimate any resulting GHG emissions.

The scope of GHG emissions is cumulative in nature, as further discussed in Response A-8.7. Additionally, as noted in Response A-8.7, the Project would also be required to comply with the County's Climate Action Plan. Lastly, it is not industry standard to perform a lifecycle analysis of potential greenhouse gas emissions from concrete and building materials as this type of emissions calculation is highly speculative in nature.

I-828.4 This comment raises concerns regarding Project VMT projections and Project job generation. The Draft EIR analysis utilized data from the Project traffic study where possible, and otherwise relied on conservative estimates from CalEEMod and the local MPO/RTPA. Regarding jobs generation, please see Topical Response 5 - Jobs.

I-828.5 This comment raises concerns regarding the VMT analysis and CO_2 emissions because of automation. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. The comment also questions the Project's job generation. Please see Topical Response 5 – Jobs, for a discussion of the development of the Project's job generation estimate.

I-828.6 This comment raises concerns regarding the Project's consistency with the Riverside County Climate Action Plan. Table 4.7-4, Climate Action Plan Consistency, in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR is consistent with explicit direction in the Riverside County CAP to assign 8 points per charging station. Measure T4.B.1 Electric Vehicle Recharging allows for the following points:

- Provide circuit and capacity in garages/parking areas for installation of electric vehicle charging stations. 2 points/area
- Install electric vehicle charging stations in garages/parking areas: 8 points/station.

Therefore, if the Project were to install 20 charging stations, it would receive 8 points/station for a total of 160 points.

However, as explained in the Project GHG Analysis (Appendix I), CALGreen includes mandatory requirements for the number of EV charging stations for nonresidential development. They are found in Table 5.106.5.3.1 which is reproduced here for convenience.

TABLE 5.106.5.3.1

TOTAL NUMBER OF ACTUAL PARKING SPACES	NUMBER OF REQUIRED EV CAPABLE SPACES	NUMBER OF EVCS (EV CAPABLE SPACES PROVIDED WITH EVSE)[2]
0–9	0	0
10–25	4	0
26–50	8	2
51–75	13	3
76–100	17	4
101–150	25	6
151–200	35	9
201 and over	20 percent of total[1]	25 percent of EV capable spaces[1]

1. Calculation for spaces shall be rounded up to the nearest whole number.
2. The number of required EVCS (EV capable spaces provided with EVSE) in column 3 count toward the total number of required EV capable spaces shown in column 2.

The Project includes site plans for Buildings B and C, and shows 545 parking spaces for Building B and 306 parking spaces for Building C. Based on the mandatory measures in CALGreen, which the Project is required to comply with, the Project (Specific Plan Area) is required to install well over 20 EV charging stations.

Building	Total Number of Actual Parking Spaces	Number of Required EV Capable Spaces	Number of EVCS (EV Capable Spaces Provided with EVSE)
B	545	109	28
C	306	62	16

In response to comments on the Draft EIR, MM GHG-7 was revised to require compliance with the CALGreen Nonresidential Voluntary Tier 2 measures for EV chargers. These are found in Table A5.106.5.3.2, which is reproduced below for convenience.

TABLE A5.106.5.3.2

TOTAL NUMBER OF ACTUAL PARKING SPACES	TIER 2 NUMBER OF REQUIRED EV CAPABLE SPACES	TIER 2 NUMBER OF EVCS (EV CAPABLE SPACES PROVIDED WITH EVSE)[2]
0–9	3	0
10–25	8	3
26–50	17	6
51–75	28	9
76–100	40	13
101–150	57	19
151–200	79	26
201 and over	45 percent of total parking spaces[1]	33 percent of EV capable spaces[1]

1. Calculation for spaces shall be rounded up to the nearest whole number.
2. The number of required EVCS (EV capable spaces provided with EVSE) in column 3 count toward the total number of required EV capable spaces shown in column 2.

Based on this revision, the Project will be required to install significantly more EV chargers. Assuming each lot in the Specific Plan will provide more that 50 parking spaces, at a minimum, each parking area would include 28 EV capable spaces, 9 of which would be provided with EV chargers. Under the CAP,

this site plan would achieve 2 points for "installing circuit and capacity in parking areas for installation of electric vehicle charging stations", and 8 points for each of the 9 EV charging stations for a total of 74 points. For larger buildings, the parking areas would have more EV capable spaces and EV chargers. This is shown in the table below for Buildings B and C.

Building	Total Number of Actual Parking Spaces	Number of Required EV Capable Spaces	Number of EVCS (EV Capable Spaces Provided with EVSE)
B	545	246	82
C	306	138	46

March JPA recognizes that footnote to Table 4.7-4 may have led to the comment's misunderstanding around the number of EV chargers that will be installed in the Specific Plan Area. As explained in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR, each building/site plan will be reviewed by March JPA, and "the March JPA shall verify incorporation of the identified Screening Table Measures within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The March JPA shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy." MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables. Table 4.7-4, Climate Action Plan Consistency, shows an example of how a Project site plan could show compliance with the CAP.

I-828.7 This comment requests additional GHG mitigation measures. Section 4.7, Greenhouse Gas Emissions, of the Draft EIR determined the Project would have less than significant GHG impacts. Regarding solar, MM-GHG-1 requires rooftop solar photovoltaic (PV) electricity generation sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. MM-GHG-7 requires each Project site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. PDF-GHG-1 requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. MM-AQ-11 requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.

MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables. MM-GHG-4 requires construction of modest cool roof, defined as Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance and 0.75 thermal emittance. MM-AQ-10 requires cool surface treatments to be added to all drive aisles and parking areas or such areas shall be constructed with a solar-reflective cool pavement such as concrete.

Regarding construction, MM-AQ-1 requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. Recirculated Section 4.2, Air Quality, of the Draft EIR and the Revised Air Quality Impact Analysis (Appendix C-1) determined the Project would have less than significant construction air quality impacts with implementation of MM-AQ-1 through MM-AQ-4.

Regarding fleet electrification, MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed. This measure would not apply to vehicles that are not owned or operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any vehicle that is otherwise legal to operate on California roads and highways.

At this time, March JPA declines to include additional mitigation related to the County's standards, concrete or rooftop vegetation.

I-828.8 This comment requests the Draft EIR analyze CO_2 emissions from the global supply chain and questions the trip lengths used. Global impacts from the international supply chain is speculative and outside the expertise and jurisdiction of March JPA.

As explained in the EIR, climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative. As also explained in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR, "Governor Arnold Schwarzenegger signed EO S-01-07 on January 18, 2007. The order mandated that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020. In particular, the executive order established a [Low Carbon Fuel Standard] LCFS and directed the Secretary for Environmental Protection to coordinate the actions of the CEC, CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels." "In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero-emission-vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector." The State (through CARB) therefore takes into account life-cycle carbon intensity" of transportation fuels.

CARB's 2022 Scoping Plan explains that "Low carbon fuel mandates similar to California's Low Carbon Fuel Standards (LCSF) have been adopted by the U.S. EPA and by other jurisdictions, including Oregon, Washington, British Columbia, the European Union, and the United Kingdom. Many other jurisdictions from Japan to New Zealand, Australia, and the European Commission also continue to seek information and technical experience on our LCFS. California has and will continue to share information and encourage ambitious emissions reductions with interested jurisdictions, with a focus on China, India, Mexico, Canada, and the European Union. California's early action to reduce super-pollutants such as methane and other SLCPs was reaffirmed by the 2021 Global Methane Pledge signed by the U.S. and over 100 other countries at the 26th Conference of the Parties to the United Nations Framework

Convention on Climate Change (UNFCCC)." [2022 Scoping Plan, p. 39]. It further explains that "at the national level, China has looked to California for cutting-edge requirements for car diagnostics and policies that promote zero-emissions vehicles. At a local level, Beijing has adopted California's vehicle emissions standards and several other progressive environmental regulations. California will continue and renew such efforts across China, including through a 2022 MOU signed with China's Ministry of Ecology and Environment." [2022 Scoping Plan, p. 40.]

I-828.9 This comment raises general opposition to the Project and recaps previous comments. No further response is required.

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From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Thursday, March 9, 2023 8:15 AM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: EnvironmentalJustice.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

Attached please find a comment on the missing Environmental Justice section of the draft EIR.

I-829.1

Please email me to confirm receipt of this public comment.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. I-829.2

A simple word search of 'justice' indicates only one word in the entire draft EIR. Criminal Justice is mentioned on p. 666/916 in the draft EIR pdf; there is no mention of environmental justice within the draft EIR or specific plan.

California state law 65040.12(e) defines the term environmental justice as
'*the fair treatment and meaningful involvement of all people regardless of race, color, culture, national* origin*, income, and educational levels with respect to the development, implementation, and enforcement of protective environmental laws, regulations, and policies.'* I-829.3

The CalEnviroScreen tool[1] published by the Office of Environmental Health Hazard Assessment (OEHHA) is the California tool used to identify low-income communities, communities of color, and other disadvantaged groups that are overburdened by high levels of pollution. California EPA uses CalEnviroScreen to prioritize enforcement and outreach in vulnerable communities.

As shown in **Figure 1**, CalEnviroScreen4.0 clearly indicates that the communities in and around the March JPA are in the top 10th percentile census tracts for CalEnviroScreen cumulative impacts indicator. Two census tracts are identified as extremely overburdened. I-829.4

- **Census tract 6065046700** – 98th percentile cumulative impact score, population 4,721 – includes Air Force Village West, March ARB, and the eastern edge of the Edgemont community of Moreno Valley.
- **Census tract 6065042505** – 99th percentile cumulative impact score, population 3,542 – includes most of the Edgemont neighborhood along Old 215, an area adjacent to and within significant ongoing warehouse development.

[1] https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40

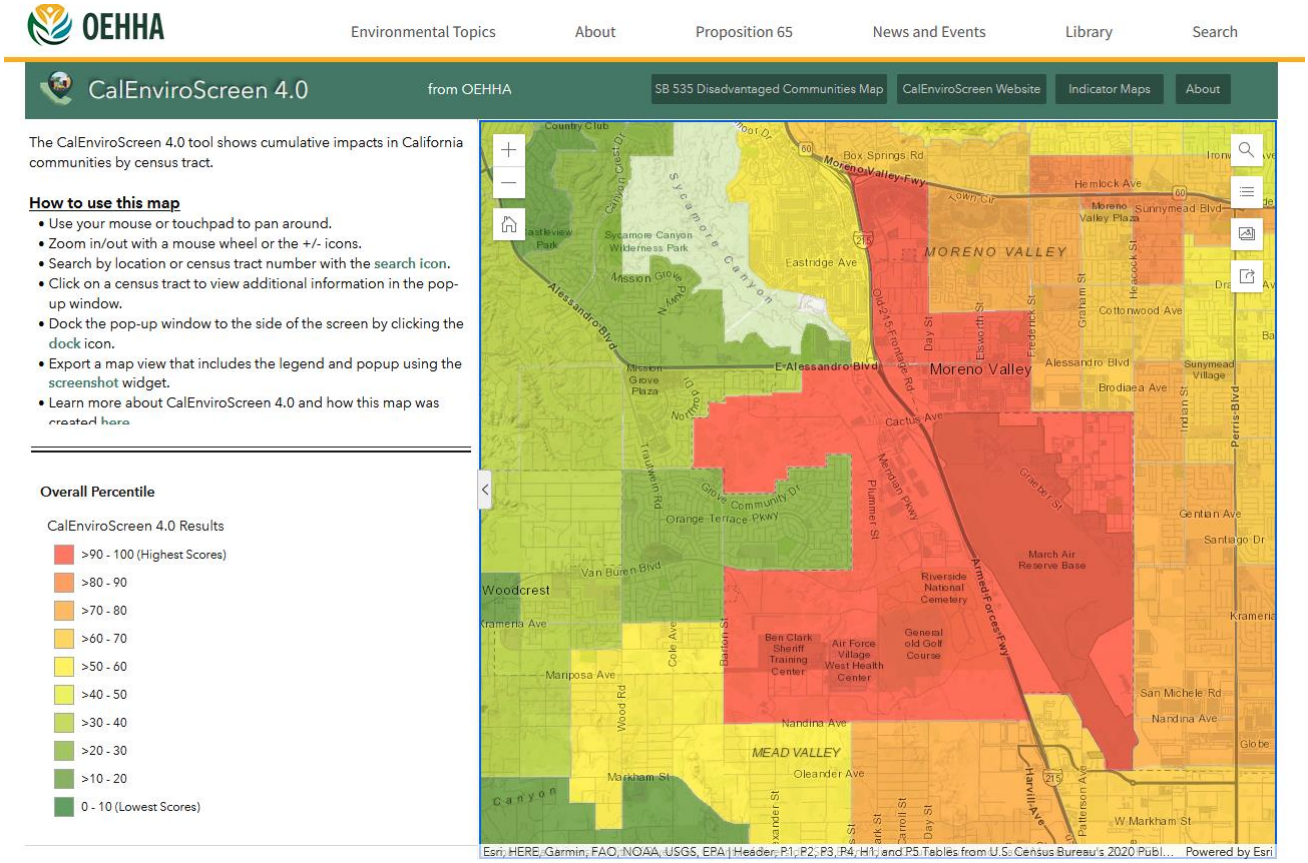


Figure 1 – CalEnviroScreen4.0 screen capture of the March JPA and surrounding communities cumulative impact score.

Census tract 6065046700 already contains at least 50 existing warehouses estimated at over 20 million square feet of cumulative space. Another 10 warehouses are entitled and/or under construction within the census tract (and March JPA), cumulatively adding another 5 million square feet. Adding the Project would put the cumulative total within the census tract at approximately 30 million square feet cumulatively – further overburdening the communities of Air Force Village West and Edgemont with truck traffic and localized pollution impacts.

Census tract 6065042505 also has multiple warehouse projects under approval or construction, including the Old 215 Business Park Project, Edgemont Commerce Center, Moreno Valley Business Center and is adjacent/downwind of the 215 Freeway which cumulatively adds emissions from ~20,000 daily truck trips to those residents.

Figure 2 shows the existing warehouses within the project area overlaid with the census tracts. **Figure 3** shows the planned and existing warehouses.

I-829.4 Cont.

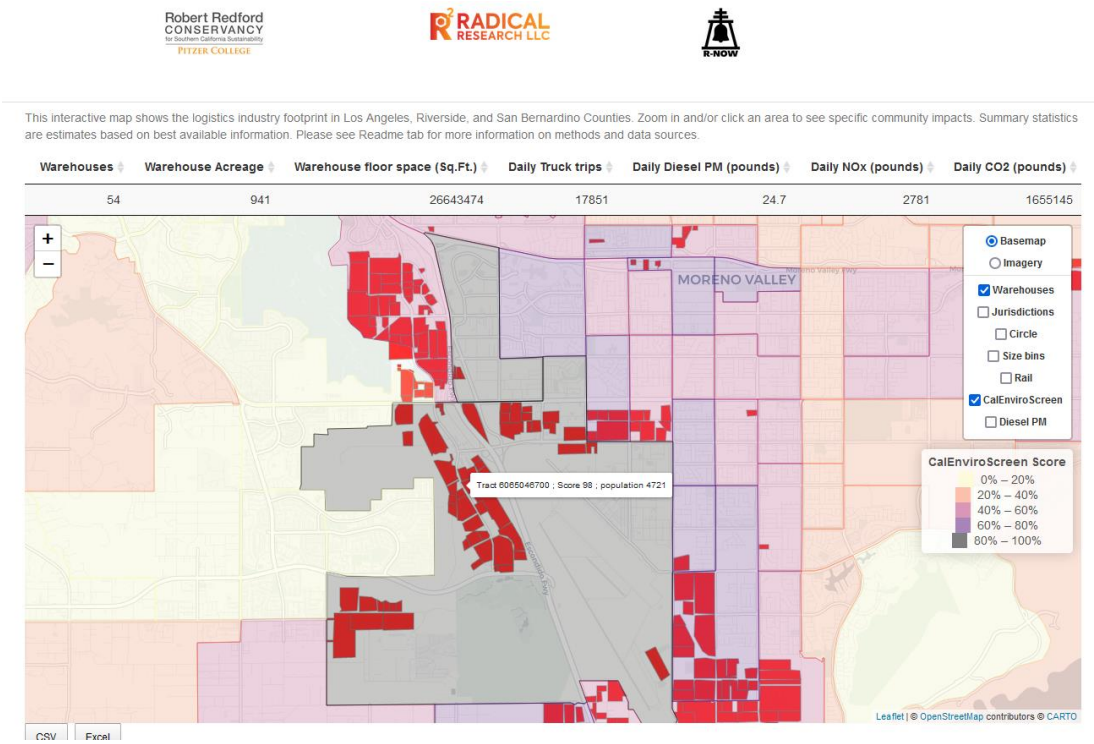


Figure 2 – Existing warehouses and census tract outlines – black polygons indicate census tracts in the top 20th quantile (disproportional impact).

I-829.4 Cont.

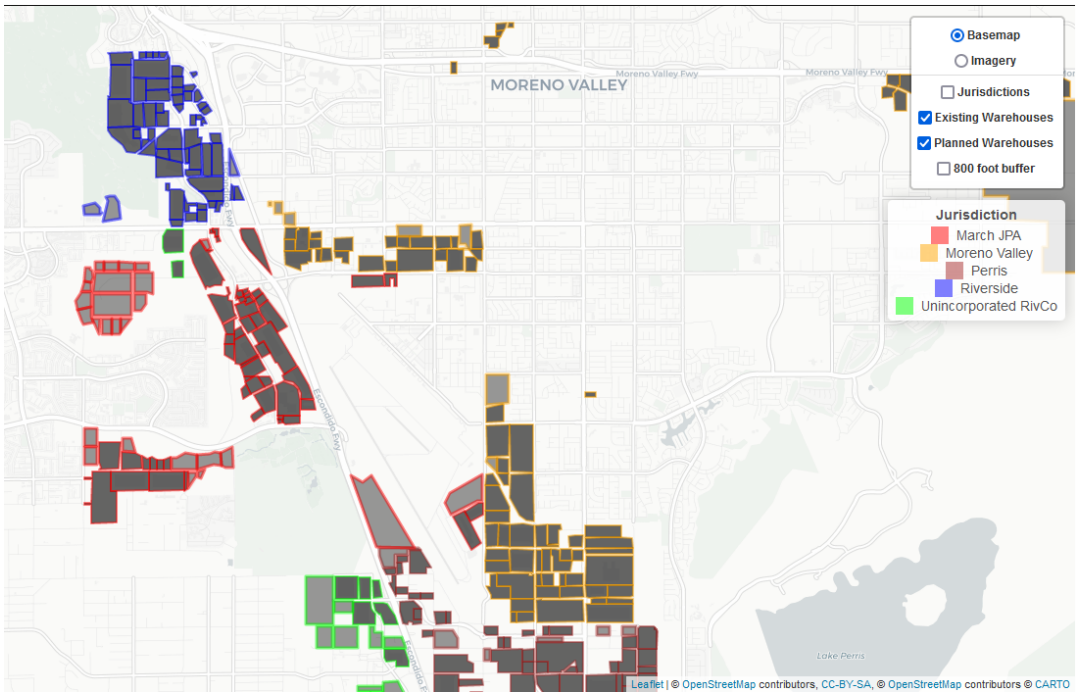


Figure 3 – Existing (dark gray fill) and approved/planned (light gray fill) warehouses around the March JPA. The cumulative impact of approved and planned warehouses in the region will disproportionately impact communities already overburdened with pollution impacts.

I-829.5

The March JPA and Project Applicant have completely omitted any analysis or mitigation measures aimed at the disproportionately overburdened communities within the identified census tracts. The March JPA General Plan does not include any mention of Environmental Justice and neither does the

I-829.6

proposed Specific Plan. It is a complete oversight that fails to provide any community benefits or outreach to the vulnerable populations within this area.

I-829.6 Cont.

The purpose of CEQA is to (1) inform the public and decisionmakers of all potential environmental impacts of proposed discretionary projects and (2) to mitigate or eliminate significant environmental effects of public agency decisions. I do not believe that the draft EIR can be considered a credible document when it entirely omits any discussion of environmental justice and the need to mitigate the cumulative environmental impacts of hundreds of warehouses adjacent to vulnerable communities.

Therefore, I ask the March JPA to justify its omission of Environmental Justice from this draft EIR. In addition, I ask for an analysis of the impacts of the cumulative projects within the March JPA on these census tracts to be evaluated and disclosed to the public as part of the EIR process. Finally, I ask that any project impacts that will disproportionately impact residents of these communities be involved in discussions around the most impactful mitigation measures that can be done to reduce the impacts of the encroaching warehouses on their communities.

I-829.7

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses



Letter I-829

Michael McCarthy
March 9, 2023

I-829.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-829.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does raise any issues or questions about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-829.3 This comment notes the absence of the term "justice" in the Draft EIR, refers to the California Government Code definition of environmental justice, and states that environmental justice is not mentioned in the Draft EIR or proposed Specific Plan. The powers and duties of the Office of Planning and Research includes coordinating environmental justice programs and, as referenced in the comment, defines "'environmental justice" as "the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." California Government Code, Section 65040.12(e)(1). Environmental justice includes: the availability of a healthy environment for all people; the deterrence, reduction, and elimination of pollution burdens for populations and communities experiencing the adverse effects of that pollution, so that the effects of the pollution are not disproportionately borne by those populations and communities; governmental entities engaging and providing technical assistance to populations and communities most impacted by pollution to promote their meaningful participation in all phases of the environmental and land use decisionmaking process; and at a minimum, the meaningful consideration of recommendations from populations and communities most impacted by pollution into environmental and land use decisions. California Government Code, Section 65040.12(e)(2).

However, "environmental justice" is not a term used anywhere in CEQA and is not an issue area identified in CEQA for analysis in an EIR. As explained in Recirculated Chapter 2, Introduction, the purpose of the EIR is to evaluate and disclose the potential environmental consequences of the proposed Project, which does include the deterrence, reduction, and elimination of environmental impacts on all people, including communities experiencing the adverse effects of pollution. The EIR describes the applicable requirements and purposes of CEQA, including to inform governmental decisionmakers and the public, including the meaningful participation in all phases of the environmental and land use decisionmaking process. The EIR discloses the potential significant environmental effects of proposed activities; identifies the ways that environmental damage can be avoided or significantly reduced; prevents significant and unavoidable damage to the environment by requiring changes in the project through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and discloses to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved. The EIR includes analysis of the Project's potential cumulative environmental effects, and the cumulative effects analysis methodology is explained in Chapter 4.0, Environmental

Analysis, of the Draft EIR. Thus, the EIR complies with CEQA and the environmental impacts of the proposed Project are fully considered, including the impacts on populations listed in the Government Code related to environmental justice.

As discussed in Recirculated Chapter 3, Project Description, Senate Bill 1000 (Government Code Section 65302[h]) requires jurisdictions to adopt an environmental justice element if the jurisdiction includes a disadvantaged community and two elements of the jurisdiction's General Plan are proposed for amendment. The March JPA planning area is within a disadvantaged community (Census Tract 6065046700) as identified by CalEnviroScreen 4.0. March JPA will need to adopt an Environmental Justice Element for its General Plan to address this requirement prior to considering approval of the Project.

An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8, and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

I-829.4 This comment provides existing conditions information from CalEnviroScreen about two census tracts, one of which includes the Project site. Figure 1 referenced in the comment is a screenshot from CalEnviroScreen of the census tracts including the March JPA and surrounding area. CalEPA's Office of Environmental Health Hazard Assessment (OEHHA) developed the California Communities Environmental Health Screening Tool (CalEnviroScreen), which provides statewide data that can be used to identify communities disproportionately burdened by multiple sources of pollution.[5] The CalEnviroScreen model includes two components representing pollution burden (exposures and environmental effects) and two components representing population characteristics (sensitive

[5] https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40

populations and socioeconomic factors).[6] An overall pollution burden score is calculated by CalEnviroScreen based on indicators related to exposures (i.e., ozone concentrations, $PM_{2.5}$ concentrations, diesel particulate matter emissions, drinking water contaminants, etc.) and environmental effects (e.g., cleanup sites, groundwater threats, hazardous waste, etc.). As noted in the comment, the census tract that includes the Project site has a high overall pollution burden score. The Project's census tract is large and includes all of the March ARB and the March JPA jurisdiction along with three blocks within the City of Moreno Valley, which appear to have been mapped as part of the March JPA. Residential uses within the Project's census tract are limited to the Westmont Village retirement community off of Village West Drive, which was originally developed for retired military housing, Green Acres, which consists of 111 homes as part of the March Field Historic District, the US Veterans transitional housing facility, and the residential block surrounding the Cottonwood Golf Center, and a few scattered residences in blocks of Moreno Valley included in the census tract. These residential uses within the March ARB census tract are located approximately two miles from the Project site, the residents in the retirement community are to the south of Van Buren Boulevard and the residents in Moreno Valley are to the east on the opposite side of the 215 Freeway. These residences are also located outside the area where the Project's truck route will emit TACs as evaluated in the Project Health Risk Assessment (See Recirculated Section 4.2, Air Quality). The other census tract referenced in the comment, census tract 6065042505, is located to the north of the census tract that includes the Project site, on the opposite side of the 215 Freeway north of the March ARB, even further from the project. As such, the proposed Project is not proximate to these residences such that it will increase their pollution burden.

The census tracts adjacent to the Project site (6065042012, 6065042014, and 6065042013), which include the Mission Grove neighborhood, the residences located in Riverside County to the north of the Project site, and the Orangecrest neighborhood south of the Project site, are not identified as disadvantaged or overburdened with pollution. Thus, the data the comment cites does not apply to these communities.

This comment provides information but does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-829.5 This comment refers to existing warehouse development within census tracts 6065046700 and 6065042505 and states that the cumulative impact of approved and planned warehouses in the region will disproportionately impact communities already overburdened with pollution impacts. Figure 2 included in the comment depicts existing warehouses in relation to the census tracts, and Figure 3 depicts existing and approved/planned warehouses around the March JPA. As discussed in Response I-829.4 above, the residential areas that are within the large census tract that includes the Project site are not proximate to the Project site. Please see Recirculated Section 4.2, Air Quality, which incorporates PDF-AQ-1 and MM-AQ-1 through MM-AQ-27 intended to reduce air quality impacts to the surrounding community, including those adjacent to the Project site and those residences cited in the comment.

[6] https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf

I-829.6 This comment states that the environmental analysis omitted any analysis or mitigation measures aimed at the disproportionately overburdened communities within the identified census tracts and that the March JPA General Plan and the proposed Specific Plan do not mention environmental justice. Please see Response I-829.3, above.

I-829.7 Community benefits provided by the Project would include increased job opportunities for local residents, preservation of open space, extension of the roadway infrastructure and the pedestrian and bicycle circulation system, a new approximately 60-acre public park, and construction of the Meridian Fire Station, at the intersection of Opportunity Way and Meridian Parkway (see Topical Response 6 - Meridian Fire Station, for additional details). Regarding outreach, March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices.

I-829.8 This comment summarizes earlier comments regarding environmental justice. Please see Response I-829.3 above regarding environmental justice and the analysis in the Draft EIR.

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Thursday, March 9, 2023 8:16 AM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: JobsPopHousing.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

Attached please find a comment on the Jobs/Housing/Population section of the draft EIR.

I-830.1

Please email me to confirm receipt of this public comment.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation area; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. I-830.2

The draft EIR estimates of population, households, and jobs (Section 4.12) rely on out-of-date Southern California Association of Local Governments projections that do not reflect the existing conditions of the region. As a result, the analysis completely misses the mark on the current status of unaffordable housing surrounding the project area, uses incorrect unemployment rates and job numbers, and passes off its responsibility to add affordable housing to the region to its member agencies without assessing whether the member agencies are meeting their Regional Housing Needs Allocation requirements. Our region needs more housing, and that is reflected in extraordinarily high local housing and rental costs. The March JPA can help contribute to solving real community needs instead of attempting to justify a warehouse complex surrounded by residential zoning over the objections of thousands of residents when jobs are plentiful and housing supply is critically low. I-830.3

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include: I-830.4

- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- Southern California Association of Local Governments (SCAG) Local Profiles Report 2019 (SCAG 2019a, 2019b)
- 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2020a)

Incorrect Population, Household, and Employment Numbers

Section 4.12 relies on SCAG and Riverside County population, housing, and employment 'forecasts' to characterize existing conditions. This is incorrect and inappropriate for three reasons. I-830.5

1) The values are based on 2016 and 2020 projections for the entire County of Riverside. Riverside County has a population larger than 15 states and encompasses an area larger than Rhode Island, Connecticut, or Delaware. Local estimates are available from the Cities of Moreno Valley,

Perris, and Riverside and from SCAG's website which provide a more accurate and resolved view of the 215/60 corridor cities.

2) The values are wrong and too high – the 2020 population of Riverside County according to the US Census was 2.418M[1] - not the projected value of 2.493M used in the report on p. 4.12-3. The number of households (740,000 vs a projected 785,000) and jobs (1,000,000[2] vs a projected 823,000) were also incorrect. In sum, the projections overestimated population by over 3.1% while underestimating employment numbers, even during the peak pandemic year, by well over 17%.
3) The unemployment numbers are ridiculous – the draft EIR uses an out-of-date 2019 5.8% unemployment rate rather than a current December 2022 value of 3.7%[3] - literally the lowest value ever recorded in the 33 years of available data collected at a county level.

I-830.5 Cont.

I-830.6

Put these three things together and it is clear the entire analysis is based on a completely flawed and unrealistic characterization of 'Existing Conditions' of employment, housing, population, and jobs/housing balance. Unemployment is at a 50 year low nationally and locally. In each of the cities and unincorporated areas of the County around the Project, unemployment rates are below 4%. There is a surplus of jobs regionally. In contrast, 500,000 people recently migrated out of California[4] because of the lack of affordable housing.

I-830.7

As a result of these inconsistencies, the jobs/housing balance in the draft EIR is completely backwards from the existing conditions in the region. On page 4.12-4, the Draft EIR estimates that the current jobs/housing ratio is 823,000/785,000 = 1.05; based on the SCAG 2019 projections. In fact, the correct number for 2020 – during the middle of the recession – **was 1,003,000/740,000 = 1.35;** this number is based on accurate reported data from the California EDD and the 2020 census reported number of households. A ratio of 1.0 to 1.29 jobs per household is considered 'balanced'. Thus, the County of Riverside is out of balance and there are too many jobs – not enough people to fill them. In 2022, the labor force has expanded to 1,110,000 jobs[2], according to the California Employment Development Department - vastly outstripping population growth and higher than the SCAG 2020b 2045 projections of 1,103,000 jobs.

The population and housing section is incorrect because it is based on projections that were demonstrably wrong the minute they were published. It is abundantly clear based on current employment numbers that we have no pressing need for additional jobs around the 215/60 corridor. Existing conditions are inaccurately characterized and reported using regional projections that are demonstrably incorrect rather than actual reported values from reputable state and federal agencies.

Therefore, the proposed project is incompatible with the Jobs/Housing Balance ratio used to justify the need for additional jobs. Moreover, there are no local employees to take these jobs, requiring imported labor from areas with higher unemployment rates, such as Hemet and San Jacinto. This will break the VMT/employee estimates in the greenhouse gas section and the air quality and traffic estimates in those

I-830.8

[1] https://www.census.gov/quickfacts/fact/table/riversidecountycalifornia/PST045221
[2] https://labormarketinfo.edd.ca.gov/geography/riverside-county.html
[3] https://fred.stlouisfed.org/series/CARIVE5URN
[4] https://www.latimes.com/california/story/2023-02-15/californias-population-has-dropped-by-more-than-half-a-million-in-about-two-years-why

sections – since the EIR naively asserts that this project will reduce VMT by providing locals with those jobs.

I ask that the March JPA

1) Justify its use of seven year-old projections for households and jobs without assessing current measured values from the census, California EDD, or other trusted government authorities
2) Justify using a 2019 unemployment rate when 2022 unemployment rates are available and are significantly lower.
3) Justify that the region has a jobs/housing imbalance weighted towards needing more jobs based on current jobs numbers and unemployment rates, and out-migration rates from the state of California
4) Justify using county-wide estimates of households and jobs when granular data from the Cities of Riverside, Perris, and Moreno Valley are available
5) Justify ignoring the enormous numbers of jobs expected regionally from cumulative projects such as the World Logistics Center and Stoneridge Commerce Center

I-830.8 Cont.

I-830.9

Affordable Housing and Regional Housing Needs Allocation

The section on the Regional Housing Needs Allocation (RHNA) lists that the Housing Element of the March JPA General Plan incorporates the four housing elements of each member jurisdiction by reference. While this is true, the March JPA is nonetheless still responsible to analyze whether each of the member agencies are meeting their RHNA requirements to establish that the regional housing balance is being met. The March JPA did not establish this in any credible way, but merely asserted that the four member jurisdictions are responsible for housing elements.

I-830.10

The Draft EIR acknowledges that its member jurisdictions are mandated by state law to provide adequate housing but fails to recognize that each of them is failing to meet state-mandated goals for any of four categories of housing ranging from very-low income to above-moderate income, with very-low income housing being wholly inadequate. The City of Riverside's overall compliance has been rated as "D" on a scale of "A-F"[5]. Similarly, the cities of Perris and Moreno Valley and the unincorporated areas of Riverside County have been rated "D+". Nevertheless, the Draft EIR rather blithely suggests that no new housing will be needed because the employees can be housed in the surrounding communities even though there is little such current availability.

Finally, I routinely peruse community message boards and a very common issue affecting people in our region is the completely unaffordable housing. Rents for one-bedroom apartments in the City of Riverside and City of Moreno Valley are routinely listed at prices over $2,000 per month[6]. That is not something that people working at warehouses making $18.75 per hour can afford. And if people can't afford to live on the warehouse wages, then they can't commute locally to those warehouses. They need to commute from cheaper areas – like Hemet, San Jacinto, or maybe Menifee.

I-830.11

The Project area is uniquely suited to developing residential housing which is sorely needed. The Section 6.3 - Alternatives Considered but Rejected – ignores the reality of the current needs of the region. There are no shortage of job opportunities regionally, especially at warehouses. Cumulatively, there are over

I-830.12

[5] https://www.ocregister.com/2023/01/17/housing-scorecard-grades-breakdown/
[6] https://www.zumper.com/apartments-for-rent/riverside-ca

50,000 jobs expected from the approved Stoneridge Commerce Center, World Logistics Center, and other warehouses being built in the region. In contrast, there is a huge shortage of affordable housing and the March JPA's impatient dismissal of the need for housing is at odds with the statewide mandate within the RHNA.

I-830.12 Cont.

I urge the March JPA to adjust its mandate to meet the current needs of the region, rather than meeting the needs of 1996 when the March AFB was closed. The purpose of the March JPA is to repurpose public lands for community benefit. Narrowly fixating on a 25 year old unemployment issue while the state hemorrhages people to other lower-cost-of-living parts of the country is ignoring the current issues in our region. Our region needs housing and open space, not more low-paying warehouse jobs.

I-830.13

I therefore ask that

1) The March JPA justify ignoring the RHNA grades of its member agencies when it states that residential allocations will be met. If the March JPA wants to delegate this to its member agencies, its member agencies must be on track to meet their RHNA obligations.
2) The March JPA specify how the member agencies will meet their RHNA obligations in a timely manner while adding so many jobs regionally.

I-830.14

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

R-NOW

Letter I-830

Michael McCarthy
March 9, 2023

I-830.1 This comment is introductory in nature and does not raise issues on the adequacy of the environmental analysis in the EIR. No further response is required.

I-830.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR and raises concerns about the Project's proximity to residential homes and other land uses. The comment incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

I-830.3 This comment questions the Draft EIR's reliance on Southern California Association of Governments (SCAG) data for population, housing, and employment. For discussion on unemployment data, see Topical Response 5 – Jobs.

The comment asserts the Draft EIR's analysis does not reflect the existing conditions of housing affordability in the Project site's vicinity. Further, the comment states March JPA is neglecting a responsibility to add affordable housing and is contributing to high local housing and rental costs. Per Section 15064(e) of the State CEQA Guidelines, "economic and social changes resulting from a project shall not be treated as significant effects on the environment." As such, housing affordability is not specifically assessed in the impact analysis. However, the Draft EIR establishes an existing condition for housing supply based on SCAG estimates and projections. These data sets are based on existing land use plans and demographic research prepared for Connect SoCal (i.e., RTP/SCS). Additionally, the EIR identifies the regional housing need goals (i.e., RHNA) for the March JPA member agencies (e.g., County of Riverside [unincorporated], City of Riverside, City of Perris, and City of Moreno Valley) in order to capture the planned housing goals within the Project site's vicinity. Describing its Housing Element, the March JPA General Plan states the "land use plan identifies no new housing areas and creates an employment center within the housing rich environment of western Riverside County." Additionally, the March JPA General Plan Housing Profile report states: "No housing opportunities are identified within the March JPA Planning Area due to land use compatibility issues related to the continued military activities of the Air Force Reserves and aviation operations." For additional discussion about why housing is not included in the Project, please see Topical Response 8 – Alternatives.

I-830.4 This comment is introductory in nature and does not raise issues on the adequacy of the environmental analysis in the EIR. No further response is required.

I-830.5 This comment questions the Draft EIR's use of SCAG data for population, housing and employment and references U.S. Census data. The Draft EIR establishes an existing condition for housing and population based on SCAG estimates and projections, which are based on existing land use plans and demographic research prepared for Connect SoCal (i.e., RTP/SCS). The comment's comparison with the US Census data is noted. However, despite the discrepancies, the Project would not result in new housing or residential population on the Project site. The conclusions within the Draft EIR would remain the same related to unplanned population growth. Less than significant impacts would occur.

The Project site is located within an unincorporated area of Riverside County and surrounded by March JPA's member agencies' jurisdictions (County of Riverside and the cities of Riverside, Moreno Valley, and Perris). Population, housing, and employment patterns are disproportionately located within the western region of Riverside County. Thus, solely utilizing unincorporated data for existing and projected conditions would not adequately capture the existing housing and population estimates within the vicinity of the Project site. Similarly, an assessment of each of March JPA's member agencies would not adequately capture existing housing and population estimates and projections within the unincorporated areas adjacent to the Project site, within and outside of the March JPA Planning Area. As such, the Draft EIR utilizes regional data sets as a comparison for impacts related to population growth due to the regional nature of the Project. Therefore, this determination represents a conservative approach in assessing the Project's potential impacts throughout the Draft EIR.

I-830.6 This comment raises concerns about unemployment data used in the Draft EIR. For discussion on unemployment data, see Topical Response 5 – Jobs.

I-830.7 This comment raises concerns about employment data used in the Draft EIR. For discussion on employment, see Topical Response 5 – Jobs. In addition, the comment questions the Draft EIR's analysis of the jobs/housing balance. This comment is similar to Comment I-830.8, below, and as such, see the following Response I-830.8.

I-830.8 This comment states the jobs/housing balance analysis with the Draft EIR is outdated and inaccurate in comparison to data provided by the US Census and the California Employment Development Department (EDD). The Draft EIR utilized SCAG's data from the most recent RTP/SCS (i.e., Connect SoCal). This is consistent with other environmental analysis within the Draft EIR that demonstrates consistency with regional plans such as the Air Quality Management Plan, which is designed to be consistent for regional planning purposes. At the time of drafting the Draft EIR, data from the US Census Bureau was not readily available across all data source needs (i.e., population, housing, and employment). Given this, the Draft EIR identified SCAG's 2020-2045 RTP/SCS (also known as Connect SoCal) as a basis for analysis due to the fact that data sources were all from the same source and to prevent data gaps between topics and available dates. For discussion on employment data, see Topical Response 5 – Jobs.

A jobs/housing balance is a ratio that indicates the number of available jobs in a jurisdiction compared to the number of available housing units. The ratio is one potential indicator of a community's ability to reduce commuter traffic and overall vehicle miles traveled (VMT) by maintaining a balance between employment and housing in close proximity to each other (Section 4.12, Population and Housing). An analysis of jobs/housing balance is based on the opportunities for a population who lives and works in an area. It is not an indication or requirement of the Project to directly meet the employment or housing needs of the surrounding community. However, additional employment opportunity is a desired objective of the Project, as explained in Recirculated Chapter 3, Project Description.

The comment asserts that the Project would provide more jobs than the amount of housing available. This estimate is purely speculative and not supported by substantial evidence given that the acreage and jobs cited within the comment's defined area (the "215/60 corridor") are provided without supporting sources. The Project site's local vicinity is anticipated to experience housing growth as facilitated by local jurisdictions' Housing Element updates and the Regional Housing Needs Allocation (RHNA). As discussed in Section 4.12, Population and Housing, of the Draft EIR, RHNA is mandated by

State Housing Element Law as part of a periodic process of updating local housing elements in city and county general plans. The RHNA is produced by SCAG and contains a forecast of housing needs within each jurisdiction within the SCAG region for eight-year periods. The RHNA provides an allocation of the existing and future housing needs by jurisdiction that represents the jurisdiction's fair share allocation of the projected regional population growth. Table 4.12-2, SCAG's 6th Cycle Final RHNA Allocation, details the housing goals for each of March JPA's member jurisdictions: unincorporated Riverside County (40,647 units), City of Riverside (18,458 units), City of Perris (7,805 units), and City of Moreno Valley (13,627 units). Therefore, a total of 80,537 housing units are planned for 2029 within the Project site's vicinity. Given this, the Project's introduction of new jobs within the local vicinity would support future population and housing growth anticipated over the next 6 years.

Despite the differences in data sources, the Project would contribute nominal employment growth to existing and future projected conditions of Riverside County. Thus, the conclusions of the Draft EIR would remain the same. The Project would not result in substantial unplanned population growth and impacts would be less than significant. For discussion on unemployment rate, see Topical Response 5 – Jobs.

I-830.9 This comment asserts the Draft EIR does not consider other projects, such as the World Logistics Center and Stoneridge Commerce Center, in assessing potential cumulative impacts related to employment growth.

For the purposes of assessing cumulative impacts related to population growth, the Project's contribution to population growth would be nominal, as detailed in Section 4.12, Population and Housing, of the Draft EIR. Thus, the Draft EIR concludes that impacts would not be cumulatively considerable. For additional information about cumulative projects, see Topical Response 7 – Cumulative Projects.

I-830.10 The comment asserts that the Draft EIR needs to assess the RHNA goals for each member agency of March JPA. As detailed in the Draft EIR, the 6th Cycle RHNA has been underway since October 2021. The planning period ends in October 2029. The EIR notes the housing goals for each member jurisdiction to supplement the analysis of future housing growth. However, the progress of meeting these housing goals by 2029 is too speculative at the time of drafting this Final EIR. As detailed in Topical Response 5 – Jobs, it is reasonable to assume the jobs generated by the Project would be filled with existing local residents residing within the County, either from the unemployed population or residents looking to reduce their commutes. The comment does not raise any specific environmental issues, questions or concerns related to the adequacy of the environmental analysis within the Draft EIR.

I-830.11 The comment raises concerns regarding affordability of local rental housing. Per Section 15064(e) of the State CEQA Guidelines, "economic and social changes resulting from a project shall not be treated as significant effects on the environment." As such, housing affordability is not specifically assessed in the impact analysis. Please see Topical Response 5 – Jobs, regarding local unemployment data.

I-830.12 The comment expresses support for an alternative with residential land uses. See Topical Response 8 – Alternatives, for more discussion about why housing was not evaluated in the Draft EIR.

I-830.13 The comment expresses general opposition to the Project and requests consideration of other alternatives. See Topical Response 8 – Alternatives, for discussion on alternatives.

I-830.14 This comment restates concern for meeting RHNA goals, as detailed in Comment I-830.10, above. See Response I-830.10 for more discussion. No further response is required.

Comment Letter I-831

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Thursday, March 9, 2023 8:19 AM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: Transportation.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

Attached please find a comment on the Transportation section of the draft EIR.

Please email me to confirm receipt of this public comment.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. I-831.1

The draft EIR Transportation analysis (section 4.15 and Appendix N) fails to adequately evaluate the regional impacts transportation of the proposed project and omits tens of millions of square feet of present and probably warehouse development along the I-215 and SR-60 corridors. The I-215 freeway is already one an incredibly overloaded route jam-packed with trucks that bottle-neck at the 215-60 interchange for 6+ hours a day; the additional trucks and passenger vehicle trips from the Project will significantly exacerbate that problem. However, the project didn't evaluate the 215/60 corridor or vehicle traffic and capacity along the 215 freeway, which is inconsistent with both WRCOG and County of Riverside guidance as well as the stated geographic scope of the transportation cumulative impacts analysis in Table 4-1. As a result, the project's transportation analysis is insufficient for evaluation and disclosure under CEQA and should be redone in full consultation with CalTrans to appropriately model the freeway impacts along the 215/60 interchange of the cumulative considerable warehouse traffic on that key piece of infrastructure. I-831.2

Additionally, the transportation element of this project is inconsistent with the Final Reuse Plan (1996) and General Plan (1999) circulation elements. Both of these documents indicate that the connection of Barton Road from Camino Del Sol through to Grove Community was not considered. Moreover, Cactus Avenue in the General Plan goes no further west than Camino Del Oro – this plan increases the proximity of this major roadway to residents. I-831.3

Finally, the project makes a number of flawed baseline assumptions in generating trip rates, bases its traffic estimates on a collection day two days after a major holiday, and provides nonsensical estimates of traffic that are physically and mathematically impossible. I-831.4

Regional Traffic Analysis

In Table 4-1, the geographic scope of the Transportation Analysis is defined as 'Regional'. On p. 4.15-8, that regional definition is scoped as a '15-mile service area' from the Project site and displayed in I-831.5

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

Each of the warehouses mentioned above are along the 215/60 corridor and truck traffic and passenger vehicles will all cumulatively add to existing traffic on the 215 Freeway. Additional large warehouse complexes along the SR-60 include the planned Beaumont Pointe[1] and Legacy Highlands Phase II[2] projects, which are cumulatively about 25 million additional square feet and are likely to generate significant truck and passenger traffic along SR-60.

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

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

I-831.5 Cont.

[1] https://www.beaumontca.gov/DocumentCenter/View/36613/Beaumont-Pointe-NOP_Final

[2] https://files.ceqanet.opr.ca.gov/280623-1/attachment/O_vgRblVruZnv-yM9ZGU1ArKJ-8b9C8BJSEK0KnfheASr5YDGNBpXjAodi5WIdQWee9KW_OeLEfL3x-X0

[3] The best local Indian restaurant – highly recommended by Mike

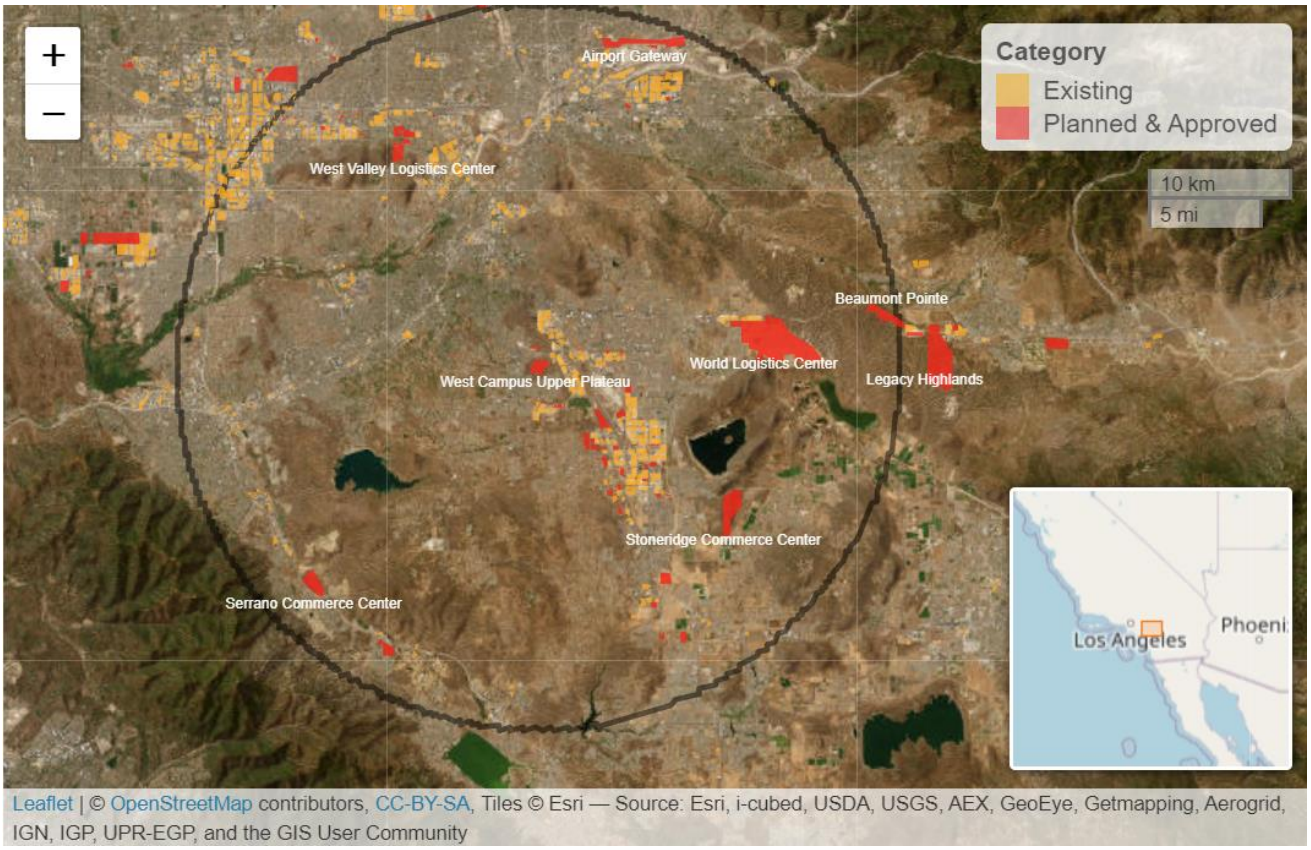


Figure 1. Map of project area with a 15-mile buffer for the regional transportation analysis that shows existing warehouses in orange and planned/approved warehouse plans in red. Projects that are approximately 5 million square feet or larger are labeled.

I-831.5 Cont.

Therefore, I ask that

1) the March JPA justify how a regional traffic analysis with a defined (Appendix N – Attachment B) 15-mile service area can exclude the primary freeway (I-215) and primary freeway interchange (215/60) from its analysis of transportation impacts.
2) the March JPA justify its failure to consult with CalTrans on a project that will add significant traffic to the 215 Freeway (~20,000 passenger trips, ~2,000 truck trips, per Appendix N, Exhibits 4 & 5) and is less than 1 mile from the 215 freeway, in contravention of WRCOG and County of Riverside guidance? "*For projects within one mile of a state highway, or any project that may add traffic on the state highway, the Engineer shall also coordinate with Caltrans.*" (WRCOG 2020, County of Riverside 2020)[4]
3) the March JPA justify its exclusion of more than 60 million square feet of planned and approve new warehouses that are within the 15-mile service area from the cumulative impacts project list.
4) the March JPA justify its exclusion of March JPA commercial cargo flights from this analysis of transportation impacts – this project, in cumulatively considerable effect with the 60 millions square feet of planned and approved warehouses in the 15 mile service area, is likely to induce additional commercial cargo operations out of the March ARB inland port. Those are not

[4] https://www.fehrandpeers.com/wp-content/uploads/2019/12/WRCOG-SB743-Document-Package.pdf

included in the transportation modeling, but need to be included in the transportation, air quality and noise sections as part of the cumulative impact of this project on the local community.

5) Justify the Cumulative Effects on VMT in the context of the more than 50,000 jobs projected to be created within the 15-mile service area and the less than 11,000 unemployed residents currently available to work given the 3.7% unemployment rate in December 2022. There are no workers for these jobs locally.

I-831.5 Cont.

Project Transportation Plan is not Consistent with General Plan

The General Plan (1999) and Final Reuse Plan (1996) displayed maps indicating the likely circulation routes considered as part of the initial EIR and planning process. **Figure 4.15-2** in the Draft EIR shows the March JPA General Plan Circulation Element Roadway Classification, reproduced below for reference. In it, Cactus Avenue is clearly seen as a major arterial roadway, but it ends prior to the Weapons Storage Area of the West Campus Upper Plateau where it goes into a minor arterial loop. Barton Street is clearly shown in the map, going from Orange Terrace Road past Van Buren. Barton St. is also shown as an intersection with Alessandro Blvd. However, Barton Street does not connect in the March JPA General Plan. Thus, the proposed plan to connect Barton Street as shown in **Exhibit 1-1** from Appendix N is inconsistent with the March JPA General Plan. Additionally, we note that the Cactus Avenue extension to the proposed Airman Drive is also inconsistent with the General Plan – Cactus Avenue extends no further than Camino Del Oro in the General Plan. Finally, there is no connection between Brown St. and Cactus Avenue. As such, it appears that the entire proposed circulation element is inconsistent with the existing general plan.

I-831.6

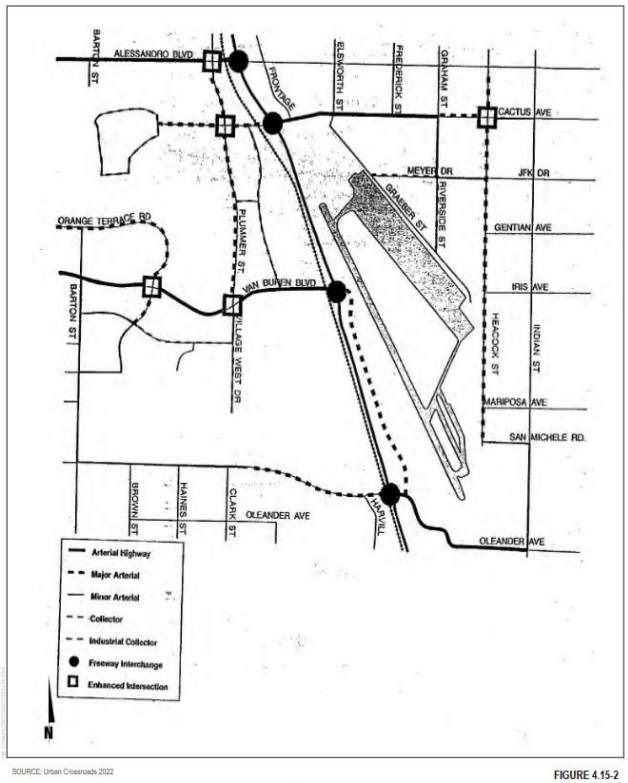




Figure 4.15-2 (left) and Appendix N – Exhibit 1-1 (right) from the Draft EIR.

CEQA Guidelines state that an EIR must discuss inconsistencies between the proposed project and any provision of the General Plan. These inconsistencies have not been discussed or identified in the EIR and thus must be addressed, potentially with a modification to the March JPA General Plan.

Therefore, we ask that the March JPA justify and explain how this project is consistent with the March JPA General Plan circulation element. Also, we note that this violates TRA-1 (conflict with a program plan, ordinance or policy addressing the circulation system) and creates a significant and unavoidable impact. Threshold TRA-1 is not addressed as inconsistent within the EIR because the basic circulation conflicts were overlooked or ignored by the Project applicant and March JPA.

I-831.6 Cont.

Trip Generation Rates and Estimated Buildings Use

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

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

WTTR = Weighted Truck Trip Rate, where:
Warehouses >200,000 = 0.95 trips/tsf/day
Warehouses >100,000 = 0.67 trips/tsf/day
Cold Storage Warehouses = 2.17 trips/tsf/day

Where tsf = thousand square feet.

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

I-831.7

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

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

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

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

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

Thus, I ask the March JPA to

I-831.7 Cont.

I-831.8

I-831.9

1) Justify using such low truck trip generation rates based on the speculative nature of the warehouse occupants rather than the default truck trip rates in SCAQMD Rule 2305 to conservatively estimate truck trips
2) Justify using a ratio of 70:30 warehouse: office space for mixed-use and business park land-uses given the last 10 warehouse projects approved by the March JPA warehouse:office ratios.

I-831.9 Cont.

Non-Physical and Mathematically Impossible Modeled Traffic Volumes

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

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

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

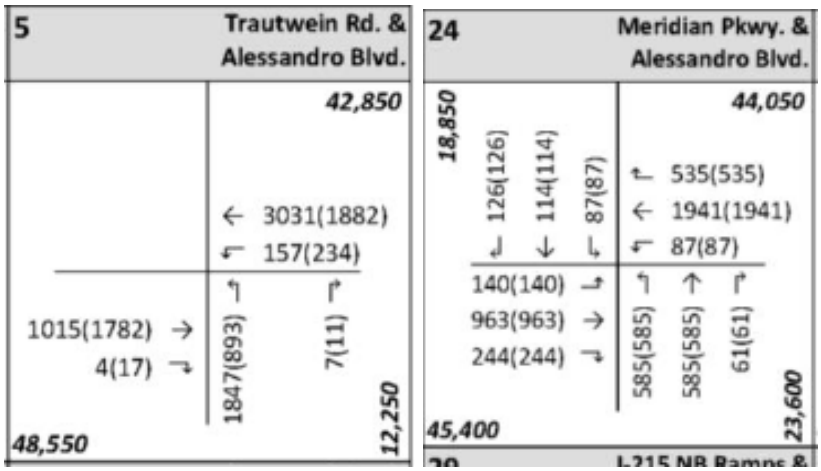


Exhibit 3-17 from Appendix N.

I-831.10

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

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

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

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



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

Thus, I ask the March JPA to

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

I-831.10 Cont.

JPA #21-02 & #17-06 – Adopted WRCOG Good Neighbor Guidelines

JPA Ordinance #21-02 is the March JPA General Plan Truck Route Map which explicitly includes the WRCOG Good Neighbor Guidelines. In it, the March JPA states in the first paragraph on p.2;

> ***Whereas,*** *this Ordinance seeks to implement objectives of the 'Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities' distributed and promoted by the Western Riverside Council of Governments.*

I-831.11

The WRCOG document is very clear (even in its title) that the #1 objective of the document is the appropriate **siting of new warehouse facilities.** The Truck Route Ordinance JPA #17-06 and the subsequent Ordinance JPA #21-02 **must consider the end point of truck routes at warehouses** to implement objectives of the Good Neighbor Guidelines for Siting New and/or modified Warehouse/Distribution Facilities.'

In this particular site plan, the end point of the truck routes are at 20 speculative warehouses with docking bays as close as 500 feet from adjacent residential homes. This site plan failed to consider and implement the objectives of the "Good Neighbor Guidelines for Siting New Warehouses" as adopted in JPA Ordinance #21-02 and #17-06. Those guidelines clearly recommend (1) Creating a buffer zone of at least 300 meters (~1,000 feet) …between warehouse[s] and sensitive receptors. (2) Establish[ing] a diesel minimization plan that 'establishes long-term goal for facility to eliminate diesel emissions at the facility', and (3) Establishing a public outreach program and conduct[ing] periodic community meetings to address issues from neighbors."

Therefore, the Project will conflict with Threshold TRA-1 (conflict with existing ordinance addressing the circulation system) and cause a significant, unavoidable impact.

I ask that the March JPA

1) Justify failing to follow its own adopted ordinance #17-06 and #21-02 regarding the siting of new warehouse facilities when considering its transportation plan.
2) Remove all warehouses/loading docks and circulation routes located within 1,000 feet of residential zoning to comply with its own adopted ordinance.

I-831.11 Cont.

Jobs Estimate and VMT/Employee Automation sensitivity

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

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

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

However, there are a large number of studies and articles indicating that warehouse jobs are extremely automatable and that autonomous vehicles (trucks and delivery) are likely to be added to the roads in the near-future, certainly at rates worth considering. The seminal work on this is 'The Future of Employment' by Frey and Osborne[5]. Automation of warehouse work is mentioned in many articles, with industry leaders such as Amazon being cited as investing large sums in automating these jobs.[6]

I-831.12

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

The following types of goods movement jobs are considered extremely susceptible to automation[7].

- Driver/Sales workers – 98%
- Locomotive engineers – 96%

[5] https://www.oxfordmartin.ox.ac.uk/downloads/academic/The_Future_of_Employment.pdf
[6] https://www.wsj.com/story/amazon-takes-steps-toward-warehouse-automation-14b7131d

[7] https://mfgriffin.shinyapps.io/Shiny/

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

I-831.12 Cont.

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

Therefore, I ask that the March JPA

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

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

R-NOW

Letter I-831

Michael McCarthy
March 9, 2023

I-831.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-831.2 This comment summarizes the proposed Project and its location and does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

I-831.3 This comment asserts that the transportation analysis in the Draft EIR fails to adequately evaluate regional cumulative transportation impacts, specifically I-215 and the 215/60 corridor. Regarding cumulative projects, please see Topical Response 7 – Cumulative Projects. Please see Response FL-G.4, regarding I-215 and the 215/60 corridor.

I-831.4 This comment states that the transportation element of the Project is inconsistent with the Final Reuse Plan and the March JPA General Plan. As explained in Recirculated Section 4.10, Land Use and Planning, the March JPA General Plan is the implementing document of the Final Master Reuse Plan and is the controlling document with regard to Project consistency. As described in Recirculated Chapter 3, Project Description, the Project's requested entitlements include amending Exhibit 2-1, Transportation Plan, of the March JPA General Plan to identify the Project's proposed revisions to the March JPA circulation network.

I-831.5 This comment asserts that the Project has flawed baseline assumptions in generating trip rates and traffic estimates because traffic counts were completed two days after a major holiday and faulty estimates. Regarding trip generation, please see Response I-831.7 and I-831.8, below. Regarding traffic estimates, please see Response I-831.10, below. As explained in the Project Traffic Analysis (Appendix N-2), existing traffic conditions are based on the traffic volumes observed during the peak hour conditions using traffic data based on an adjustment of both historic (2019) traffic count data and new (2021) traffic count data collected on Tuesday, November 30, 2021. Although the Thanksgiving holiday was the previous week, traffic patterns and volume would have returned to normal by the time of the 2021 traffic count. Typically, holiday traffic increases the weekend after Thanksgiving and returns to normal the following week. As stated in the Project Traffic Analysis, there were no observations made in the field that would indicate atypical traffic conditions on the count date, such as construction activity or detour routes and nearby schools were in session and operating on normal schedules.

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

I-831.6 This comment states the EIR is inconsistent in evaluating traffic impacts because the cumulative projects list does not include projects within the regional 15-mile service area. Please see Response I-831.6.1, below, and Topical Response 7 – Cumulative Projects. The comment further questions impacts to I-215 and the 215/60 interchange, and describes personal experiences with area traffic. Please see Response FL-G.4, regarding I-215 and the 215/60 corridor. Regarding comment's concerns about trucks accessing local roads, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Under PDF-TRA-1, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway. Specific comments are addressed below.

1) This comment questions the geographic scope for regional traffic analysis. The 15-mile service area identified by the comment signifies the bounds of the region utilized by the Project VMT Analysis to determine if the addition of the Project's retail component would result in a net increase in total VMT for that region. As explained in the Project VMT Analysis, a 15-mile service area is a conservatively estimated distance from the Project as the retail component is not anticipated as a regional shopping destination, but instead is anticipated to serve the surrounding communities of Riverside, Moreno Valley, Perris, etc. Please see Response FL-G.4, regarding I-215 and the 215/60 corridor.
2) This comment questions Caltrans consultation as required by WRCOG and County guidance. regarding I-215 and the 215/60 corridor. March JPA has adopted its own guidelines for traffic analysis: the March JPA Traffic Impact Study Guidelines, dated February 10, 2020 (March JPA Guidelines). As March JPA is the lead agency for this Project, the Project Traffic Analysis (Appendix N-2) was developed pursuant to the March JPA Guidelines, rather than the WRCOG or County of Riverside Transportation Planning guidance documents. Pursuant to Caltrans safety requirements, the Project Traffic Analysis (Appendix N-2) included an assessment of the I-215 off-ramps at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard to ensure there is no queuing, or back-up, onto the freeway mainline. These I-215 off-ramps were selected because the Project is anticipated to contribute 50 or more peak hour trips to these off-ramp intersections, consistent with the March JPA Guidelines. Caltrans was notified about the Project through the release of the Notice of Preparation on November 18, 2021. Caltrans also received the Notice of Availability for the Draft EIR when the document was circulated for public review beginning on January 9, 2023. No comments were provided by Caltrans during the scoping period or public review for the Project.
3) This comment states the cumulative projects list does not include projects within the regional 15-mile service area. Please see Response I-831.6.1, above, regarding the purpose of the 15-mile service area. Separate from the Project VMT Analysis, the Project Traffic Analysis, included as Appendix N-2 to the Draft EIR, utilizes a 5-mile radius around the Project site for determination of approved and pending projects for cumulative analysis as required by the March JPA Guidelines. Please see Topical Response 7 – Cumulative Projects. Additionally, the cumulative analysis depends on data from the RIVCOM model. In other words, the cumulative analysis relies upon Riverside County's model, and not solely on information from the proposed Project.
4) This comment questions the exclusion of commercial cargo flights from the transportation analysis. Because the March ARB/Inland Port Airport is a joint use airport, civilian flights,

including commercial cargo flights, are limited through a Joint Use Agreement between the March JPA and the U.S. Air Force.7 Additional flights can only be approved after environmental review of the proposed operating agreement through CEQA.[8] No additional flights are proposed as a part of this Project. No revisions to the Project Traffic Analysis or other impact analyses are required.

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

I-831.7 This comment questions the Project Transportation Plan's consistency with the March JPA General Plan. As described in Recirculated Chapter 3, Project Description, the Project's requested entitlements include amending Exhibit 2-1, Transportation Plan, of the March JPA General Plan to identify the Project's proposed revisions to the March JPA circulation network.

I-831.8 This comment is about trip generation rates for trucks. The comment states that Project truck trips should be evaluated based on South Coast Air Quality Management District (SCAQMD)Rule 2305 rather than ITE trip rates. Please see Response FL-B.7 detailing the development and intended application of the Rule 2305 weighted average truck trip rates.

I-831.9 This comment asserts that the mix of business park to office use is unrealistic and requests an analysis of a different ratio. The trip generation rates utilized for the proposed Project are shown in Table 4-1 of the Project Traffic Analysis (Appendix N-2), and in Table 4.15-1 in Section 4.15, Transportation, of the Draft EIR. These rates are obtained from the ITE Trip Generation Manual (11th Edition, 2021) and the WRCOG High Cube Warehouse Trip Generation Study (WSP, January 2019) for the industrial uses. These sources are the industry standard in determining the proposed Project trip generation, as they are based on data from similar use facilities. The land uses evaluated in the Project Traffic Analysis are the most similar land use types to the function and operations of the proposed Project. Based on the ITE description for Business Park, the average mix is 20 to 30 percent office/commercial and 70 to 80 percent industrial/warehousing. As such, 30% of the business park area has been designated as office related uses, while the remaining 70% of the business park area has been allocated to warehousing uses. This 30/70 split is not intended to reflect office space within a warehouse but rather to capture other foreseeable uses allowed with the Business Park land use designation under the proposed West Campus Upper Plateau Specific Plan. As such, no revisions to the Draft EIR or Project Traffic Analysis are necessary based on this comment.

7 https://www.marchjpa.com/documents/docs_forms/joint_use_agreement.pdf
8 https://marchjpa.com/wp-content/uploads/2022/05/MIP-Carrier-req-for-Operational-status-instructions-2021.pdf

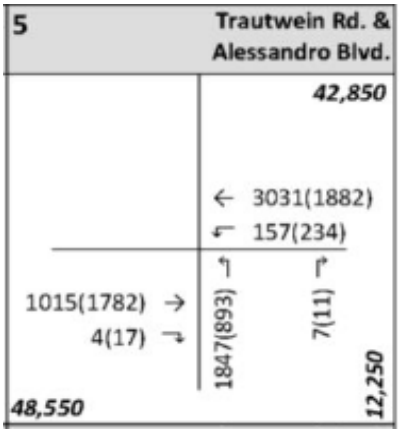
I-831.10 This comment asks that March JPA justify truck generation rates and the use of a ratio of 70:30 used in the Traffic Analysis. In response to truck generation rates, please see Response FL-B.7, and in response to the 70:30 ratio, please see Response I-831.9.

I-831.11 This comment is about modeled traffic volumes. As discussed in the Project Traffic Analysis (Appendix N-2 of the Draft EIR), existing weekday Average Daily Traffic (ADT) volumes are based on actual 24-hour tube count data. The traffic counts were adjusted to include ambient growth to reflect 2021 traffic conditions (reflected in the ADT volumes). ADT volumes are calculated using the formula:

Weekday PM Peak Hour (approach volume + exit volume) x 10.61[9] = Leg Volume

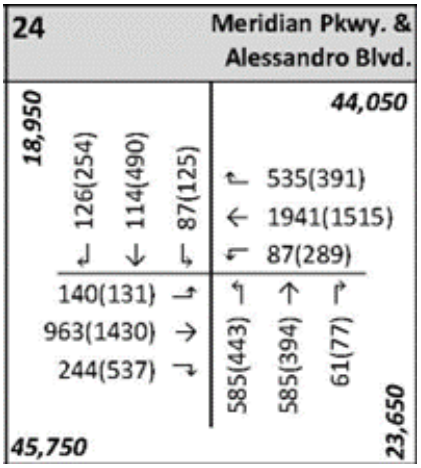
As discussed in the Project Traffic Analysis, the factored ADT volumes from the PM peak hour traffic volumes is based on the sum of all approach volumes and all exiting volumes, to accurately reflect all the traffic volumes on that specific roadway segment.

For the calculation of daily traffic volumes, the factor discussed above (10.61) has been utilized. Daily traffic volumes should not multiply the total peak hour traffic by 24, as the peak hour volume is generally higher than other hours of the day. Multiplying by 24 would overstate the daily traffic volumes. As such, a peak-to-daily ratio has been calculated using the above formula, to forecast the daily traffic volumes for a roadway segment.



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

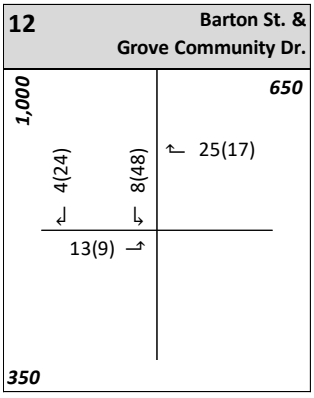
[9] The text of the Project Traffic Analysis incorrectly stated the ADT factor as 10.20. The correct ADT factor is 10.61. The text has been corrected in the Project Traffic Analysis. The analysis used the correct ADT factor and no further revisions to the Project Traffic Analysis are required.



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

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

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



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

Exhibit 4-3 of the Project Traffic Analysis has been revised to reflect the corrected intersection diagram for Intersection #12. The analysis used the correct lane configuration and no further revisions to the Project Traffic Analysis are required. This revision does not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

I-831.12 This comment asserts March JPA has adopted the WRCOG Good Neighbor Guidelines through JPA Ordinance #21-02. JPA Ordinance #21-02 references the WRCOG Good Neighbor Guidelines in a recital. That reference does not constitute adoption of the WRCOG Good Neighbor Guidelines. Please see Table 4.10-2 of Recirculated Section 4.10, Land Use and Planning, for a discussion of the Project's consistency with the County of Riverside Good Neighbor Guidelines Topical Response 4 - Project Consistency includes a discussion of the Project's consistency with the City of Riverside Good Neighbor Guidelines.

I-831.13 This comment questions the jobs number and VMT analysis in the Draft EIR and Traffic Analysis, as well as the future of the logistics industry. Justification for the jobs estimate used throughout the Draft EIR is discussed in Topical Response 5 – Jobs. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Project VMT Analysis. In general, if there is an additional level of automation that impacts on-site jobs, overall VMT would decrease compared to what has already been evaluated in the Project VMT Analysis. Pursuant to OPR Guidance, truck trips are not included in the Project VMT Analysis and future automation of such jobs would not impact the Project VMT Analysis. Additionally, the goal of SB 743 and VMT-based analysis is to reduce greenhouse gases. The current trend is for autonomous vehicles to be hybrid or fully electric, which supports the ultimate goal of SB 743. As such, the Project VMT Analysis provides a more conservative analysis, and no additional analysis is necessary.

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Thursday, March 9, 2023 8:21 AM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: unstableEIR_plan.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

Attached please find a comment on the instability of the Project Plan within the draft EIR and associated planning documents. I-832.1

Please email me to confirm receipt of this public comment.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes.

The draft EIR site documentation is unstable, with multiple versions of a site plan, construction plan, and project boundaries that are inconsistent throughout the draft EIR. As a community member attempting to understand the project's environmental impacts, it is extremely important that the project description matches the environmental analyses being performed. However, in the case of the draft EIR for this project, the inconsistent site plan and project description indicate a last-minute set of changes were made to the site plan, project boundaries, and construction boundaries that is not consistently reflected throughout analyses that were performed up to 18 months prior to the EIR's release. As such, I am asking that all figures and analyses reflect a single consistent project plan that is evaluated holistically across each of the environmental impact areas.

I-832.2

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- General Plan of the March Joint Powers Authority[1], assumed 1999 date – last updated 2/17/2022 (General Plan, 1999)
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

[1] https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf

Given that the project's draft EIR and appendices do not reflect analyses that were performed on the final EIR's site plan, we ask that all old analyses that do not reflect the current site plan be updated to display the correct information and evaluate the site plan as proposed in the Section 3 of the draft EIR.

I-832.2 Cont.

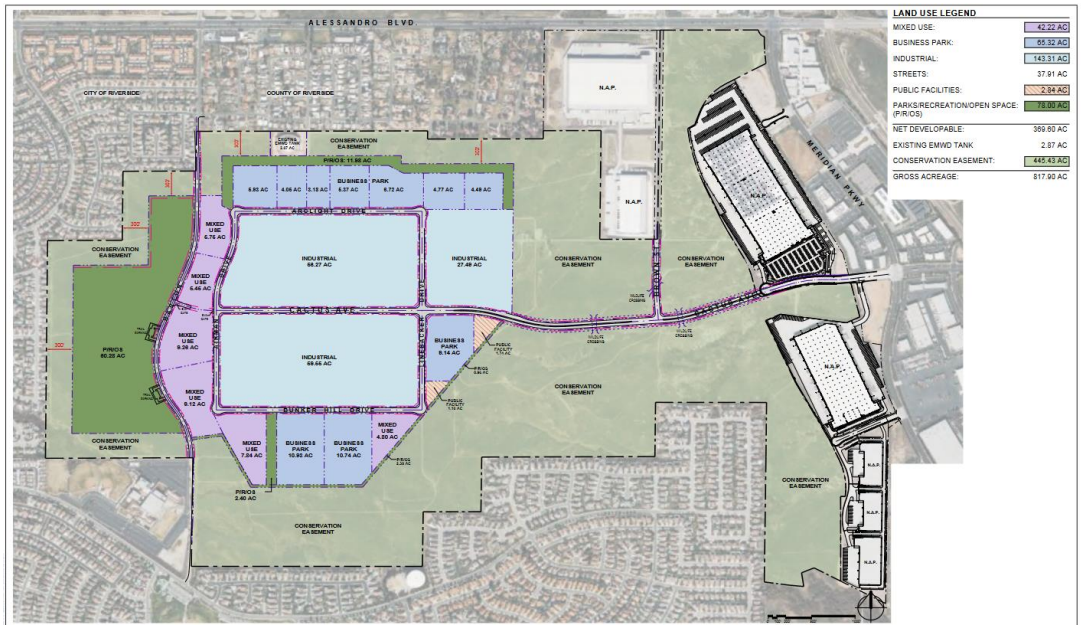
Overview

Site Plan Map

The Key map that is inconsistent throughout the draft EIR is the Project **Site Plan** which is shown below and displays the individual zones for multiple industrial, business park, mixed-use, and parks/recreation/open space and easement boundaries. In the draft EIR, this is **Figure 3-5.** This site plan layout mostly reflects the project description – which we list here for completeness from Section 3.5.1

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1, 280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facility – 2.84 acres for future sewer lift station and electrical substation (within the Specific Plan Area

I-832.3



Of note, the Industrial Area 500,000 high-cube cold storage warehouse and 725,561 square foot warehouse are not specifically drawn into the 'Building A' industrial zone.

However, the site plan does clearly indicate that there are specific parcels planned out for the business park and mixed-use areas (but not the Building A industrial area, despite two separate types of uses being identified).

I-832.3 Cont.

Project Boundary Map

Three specific maps are used across the EIR to define the Project. The Project Location map is used to display the boundaries of the Project Site, and is shown in **Figure 3-1** of the draft EIR. I will call this the **'Project Boundaries'** throughout the draft EIR and a consistent boundary is shown for many EIR maps in the report.

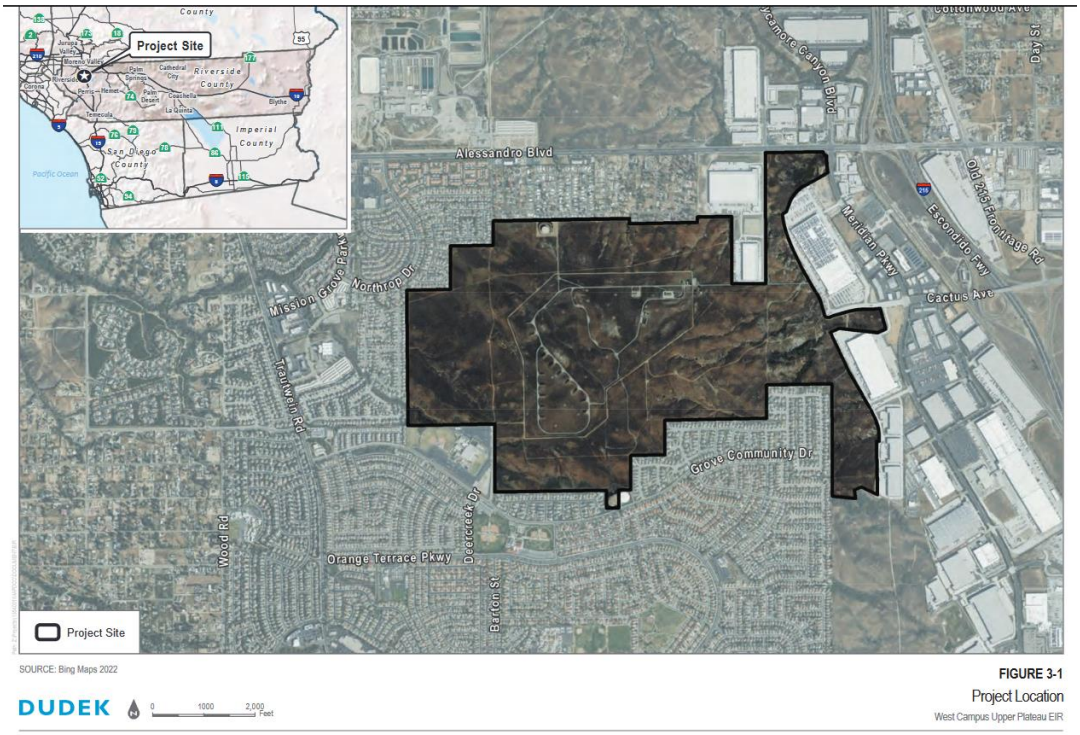


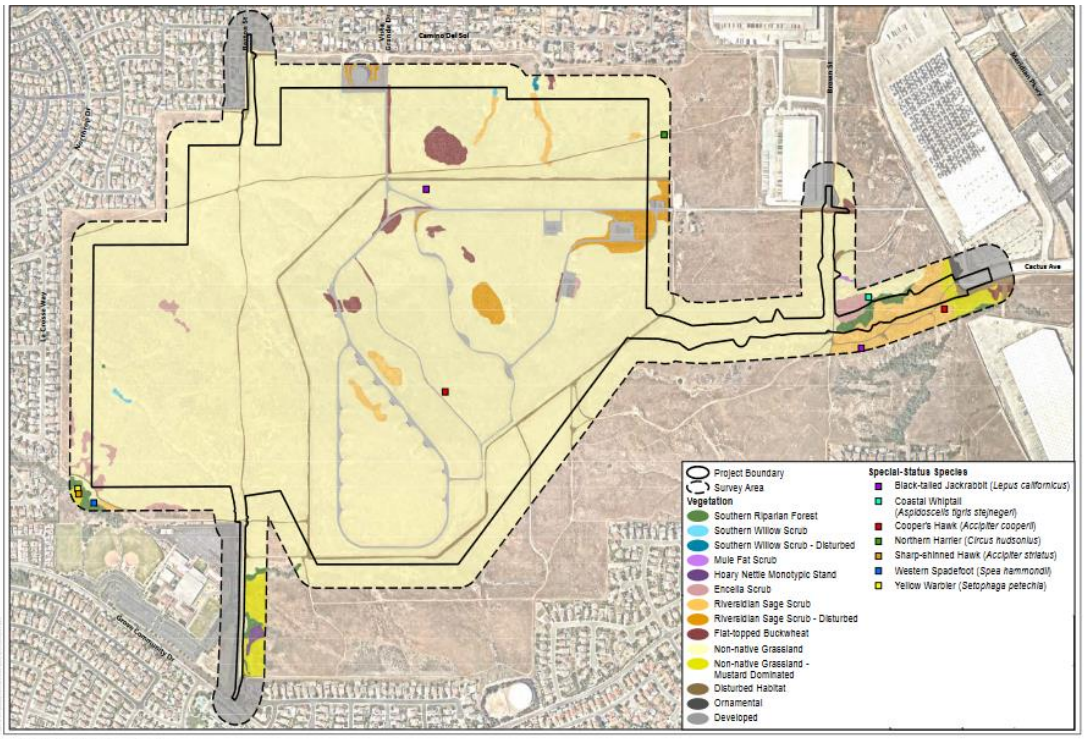
FIGURE 3-1
Project Location
West Campus Upper Plateau EIR

I-832.4

Construction Boundaries Map

The third map used inconsistently throughout the EIR is the Construction boundaries zone. The construction area isn't explicitly defined in the Section 3 project overview and is often-based on a buffer around the Specific-Plan area in **Figure 3-3**. The first occurrence of a construction boundary is shown in **Figure 4.3-1** in the Biological Resources section. The key differences between this figure and the Site Plan map is the inclusion of roadway segments along Barton to the North and South of the Specific Plan Area, and connections along Cactus Avenue and Brown Street. These construction boundaries include roadway segments connecting the Project to existing roadways. Of note, the roadway south along Barton connects all the way out to Grove Community Drive and appears to include potential construction within 10s of feet from homes and the Grove Church. Similarly, the connection on Barton North has a similar extrusion beyond the Project boundaries that is within 10s of feet of homes on both sides.

I-832.5



SOURCE: Rocks Biological Consulting 2022

DUDEK

FIGURE 4.3-1

Biological Resources in the Project Site

West Campus Upper Plateau Draft EIR

I-832.5 Cont.

Project Site Plan Inconsistencies in EIR

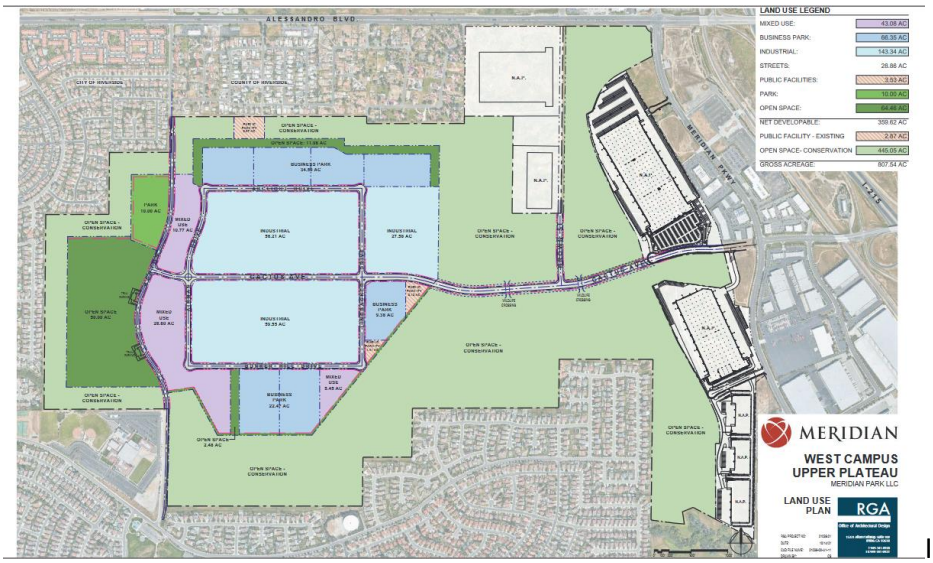
In the Appendix A - IS/NOP **Figure 4** shows the original Site Plan for the project. We show it below across from the Figure 3-5 in the EIR for comparison purposes.

There are three key differences that are shown that changed between the IS/NOP Figure 4 and the Figure 3-5 Draft EIR that should be reflected in analyses within the EIR.

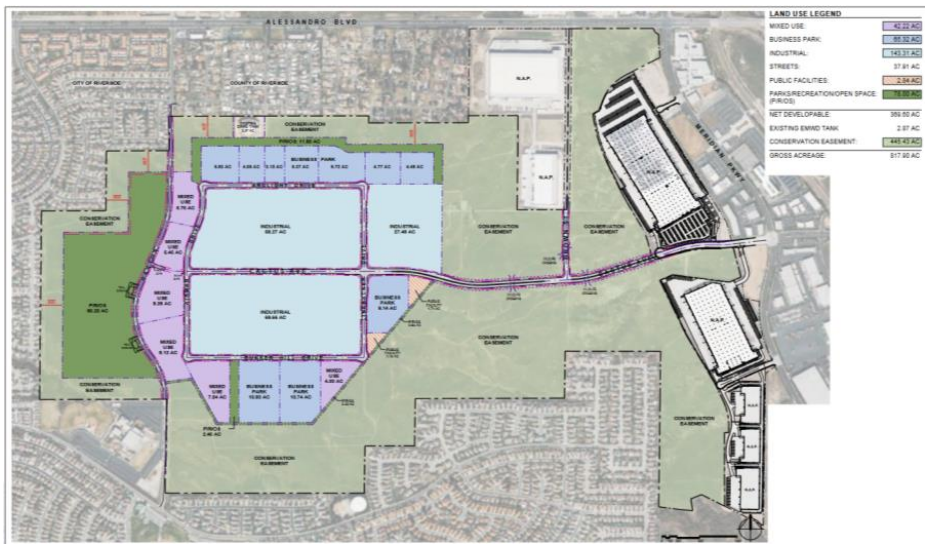
1. The number of business park parcels goes from 7 to 10, as the parcels in the north of the project were subdivided to conform to City of Riverside Good Neighbor Guidelines that restrict warehouse sizes to under 100,000 square feet within 800' of homes.
2. The number of mixed-use parcels goes from 3 to 6, as the mixed-use parcels are also zoned for warehouse uses and many of them are also within 800' of residential zoning – the ones to the North conform to City of Riverside Good Neighbor guidelines but the two to the southwest of the project do not.
3. The Park in the west section of the project boundary goes from 10 acres of park and 48 acres of open space to 60 acres of park.

Nothing else that we can identify changes between the two project site plans. The total size and acreage devoted to each zoning type is unchanged. Setbacks are identical and the public access points to trail parking are identical.

I-832.6



In



I-832.6
Cont.

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

I-832.7

Table 1 – List of Draft EIR, Appendices, and Related Document Maps with Site Plan overlays

Figure or Table	Description	IS NOP-Figure 4 plan	DEIR Figure 3-5 plan	Comments	Conflicts
Figure 3-5	Site plan		X		
Figure 3-6	Proposed Truck Routes	X		No connection on Brown St. within JPA boundaries?	Figure 3-5; 3-8
Figure 3-7a	Sewer system	X		Multiple proposed sewer lift stations	Figure 3-5; 3-8
Figure 3-7b	Potable water system		X	Appears to extend beyond project boundary (south side below Grove community Drive	Figure 3-1
Figure 3-7c	Reclaimed water system	X		Unclear from map whether 12" pipe along homes is on site boundary?	
Figure 3-7d	Storm Drain system		X	This shows proposed Building A subdivision not shown on any other map?	Figure 3-5; 3-8
Figure 3-7e	Electrical backbone	X		No connections to multiple business park buildings	Figure 3-5; 3-8
Figure 3-7f	Telephone backbone	X		same as 3-7e	Figure 3-5; 3-8
Figure 3-7g	Cable TV backbone	X		ditto	Figure 3-5; 3-8
Figure 3-7h	Gas backbone	X		Air quality section claims no natural gas used, yet there is a natural gas backbone	
Figure 3-8	Parcel Map		X	How is proposed public right-of-way not being shown helpful for clarity? Also, EMWD in parcel D?	Figure 3-5
Figure 4.1-2	Key Points Viewpoint Map	X			Figure 3-5; 3-8
Figure 4.1-3	Viewpoint 1 photosimulation	X		Should be 3 visible warehouses with walls	Figure 3-5; 3-8
Figure 4.1-4	Viewpoint 2 photosimulation	X		Figure 3-5; 3-8	
Figure 4.1-5	Viewpoint 3 photosimulation	X		Should be 6 visible warehouses, walls, and a road	Figure 3-5; 3-8

I-832.7 Cont.

Figure 4.3-4	Proposed Project Impacts	X			Figure 3-1; 3-5, 3-8
Figure 4.9-2	Master drainage plan areas	X		Inconsistent development area - omits water quality area and parks	Figure 3-1; 3-5, 3-8
Figure 4.9-3	Proposed Project Site and Watersheds	X		Old site plan; omits northern and eastern boundary of project area	Figure 3-5; 3-8
Figure 4.11-9	Operational Noise source locations	X		Old site map - building A and north building layouts are wrong; no truck movements within mixed-use or BP facilities; missing park activities in 'open space'	Figure 3-5; 3-8
Figure 6-1	Alternative 2 - Reduced Development area alternative	?	?	Mix of IS/NOP and new mixed-use? No reduction?	Figure 3-5; Figure 3-8
App B - p.3	Sight Line Section	X		Old Site plan - no reduced development at all	Figure 3-5; Figure 3-8
App B - p.5	Conceptual Grading NW	X			Figure 3-5; Figure 3-8
App B - p.7	Conceptual Grading SW	X			Figure 3-5; Figure 3-8
App B - p.9	Conceptual Grading NE	X			Figure 3-5; Figure 3-8
App C1/2 - Exhibit 1-B	Site Plan			Old site plan - note that there are two figures both labeled Exhibit 1-B - This is the second one; Site Plan not the Location Map	Figure 3-5; Figure 3-8
App C2 - Exhibt 2-B	Modeled on-site emissions sources	?	?	Semi-old Site Plan - doesn't explicitly model TRUs or loading Docks for two Industrial buildings or subdivide northern BP buildings	Figure 3-5; Figure 3-8
App F - Exhibit 1-B	Site plan	X		Old Site Plan - note two Figure 1-B	

I-832.7 Cont.

App G - Plate 1	Geotechnical map	X		Sep-21	Figure 3-1; Figure 3-5; 3-8
App J4 - p7, 8	Project Description inconsistent	X		Park = 11 acres, open space = 67 acres	Figure 3-5; Figure 3-8; project description
App J4 - Figure 2	Specific Plan	X		old park, incorrect plan; dated April 2022	Figure 3-5; Figure 3-8; project description
App K1 - p21	Proposed hydrology zones map	X		Old map	Figure 3-5; Figure 3-8; project description
App K2	Prepared September 1, 2021	X			
App M - Exhibit 1-B	Site Plan	X		Old map	Figure 3-5; Figure 3-8
App M- Exhibit 9-A	Operational noise source locations	X		Old map; no noise on Barton road or Brown St?	Figure 3-5; Figure 3-8
App N - Exhibit 1-1	Preliminary Land Use Plan	X		Old map	Figure 3-5; Figure 3-8
App N - Exhibit 1-4	Site Adjacent roadway and site access recommendation	X		Old	Figure 3-5; Figure 3-8
App N - Exhibit 1-5; 1-6	West Campus Upper Plateau Raodway Cross-Sections	X			Figure 3-5; Figure 3-8
App O - p.11/50	Project Land Use Map	X		Feb-22	Figure 3-5; Figure 3-8

I-832.7 Cont.

App P - Figure 3.1	Proposed Trunk Sewer	X		304 acres Industrial!	Figure 3-5; Figure 3-8; Specific PLan
App P - Figure 3.2	Sewer Manhole Map	X		doesn't show conservation area?	Figure 3-5; Figure 3-8; Specific Plan
App P2 - Figure 3-4	Ultimate Irrigation areas			March JPA Soccer Fields!	figure 3-1; figure 3-5; 3-8
App Q - Figure 3	project site plan	X			
App Q - Figure 9	Fuel Modification Plan	X			Figure 3-5; 3-8
Specific Plan - Figure 4-1	Landscape Fence and Wall Plan	X		Old Plan within specific plan	Figure 3-5; 3-8 in DEIR - Figure 2-1 in Specific plan
Specific Plan - Figure 4-2	Exhibit Key Map	X		Figure 2-1 in Specific plan conflict as well	Figure 3-5; 3-8 in DEIR
Specific Plan - Figure 4-19	Photo Simulation Key Map	X		Figure 2-1 in Specific plan	Figure 3-5; 3-8 in DEIR
Specific Plan - Figure 5-1	Circulation Plan	X		Figure 2-1 in Specific plan	Figure 3-5; 3-8 in DEIR
Specific Plan - Figure 5-3	Truck Route	X		Omits Van Buren and Alessandro; Figure 2-1 in Specific plan	Figure 3-5; 3-8 in DEIR
Specific Plan - Figure 5-4	Non-motorized Circulation plan	X		Figure 2-1 in Specific plan; Figure 4-1fence plan	Figure 3-5; 3-8 in DEIR
TPM 20750	Detailed Parcel Map		X		

I-832.7 Cont.

As can be seen from Table 1, more than 80% of the draft EIR maps that include a Site Plan overlay are not consistent with specific plan, tentative parcel map, and Figure 3-5. This is not merely an oversight – this is a clear change in the Site Plan that occurred late in the planning process that resulted in a series of technical errors and omissions that do not account for the current site plan for the project.

A few of the key technical errors and omissions that occurred because of the late changes to the project are clearly visible in the maps. We'll provide a few here as examples of the why the entire EIR needs to be redone to consistently use the same site plan.

1. Connections of the individual parcels in the North Business Park and West Mixed-Use portions of the project to electrical, telephone, gas, and road routes in Figures 3-6, 3-7e, 3-7f, 3-7h all lack specific parcel drawings
2. Visual photosimulations in the Aesthetics Section mostly display the incorrect number of buildings (Figures 4.1-2 : 4.1-4)
3. Drainage basins in Figure 4.9-3 don't indicate correct layout of park or North Business Park and West Mixed-Use portions of the project and thus don't correctly indicate actual project drainage after current changes (watersheds go through buildings)
4. Noise source locations in Figure 4.11-9 are incorrect due to revised building and park plans – this needs to be fixed to reflect the current site plan
5. Modeled on-site emissions for air quality and health risk assessment sections in Appendix C1 and C2 Exhibit 2-B are incorrect and do not reflect the location of the proposed cold storage warehouse which is critical to model correctly due to the longer idling times and higher emissions for the TRU units at docking doors. The 'Industrial' Building A cannot be modeled as a single indistinguishable building when two separate mega-warehouses are proposed in that parcel that have very different emissions characteristics.
6. Specific Plan maps exhibit the same errors and inconsistencies that make it extremely confusing to tell which plan is being proposed. The circulation plan is wrong, the truck route is wrong, and the non-motorized circulation plan conflicts with the fence map.

Given the importance of accurately evaluating and disclosing the environmental impacts of the project, we respectfully submit that all incorrect and inaccurate maps in the draft EIR be corrected and replaced with accurate maps of the current site plan. In any cases where the maps are actually used for technical analysis, we request that the analyses be revised to reflect the 2023 site plan rather than the one from September 2021.

I-832.8

Construction Boundaries Inconsistences in the Draft EIR

Construction area boundaries are also defined inconsistently through the draft EIR. This is at least partially due to there being no defined construction map overview section in Section 3. At least three separate versions of construction boundaries to be disturbed are defined in different technical sections.

The first version is the biological survey map, which is essentially the Specific Plan Area plus the roads, as shown in Figure 4.3-1 above. The second version is the Appendix E Cultural Resources section, which only examined the Weapons Storage Area, as shown in Plate 1 from Appendix E below. The third version is the Air Quality, Noise, and Sensitive Receptor Location map which shows a site plan plus some roads, but includes no buffer zone and excludes the Barton Road South along the Grove Church.

I-832.9

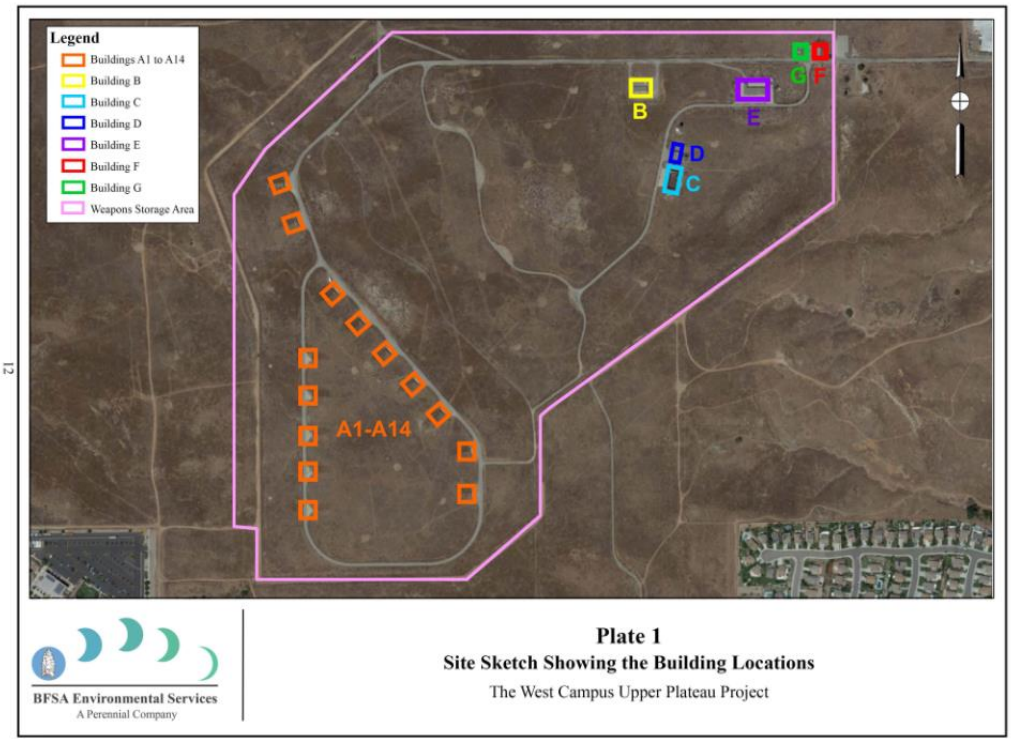
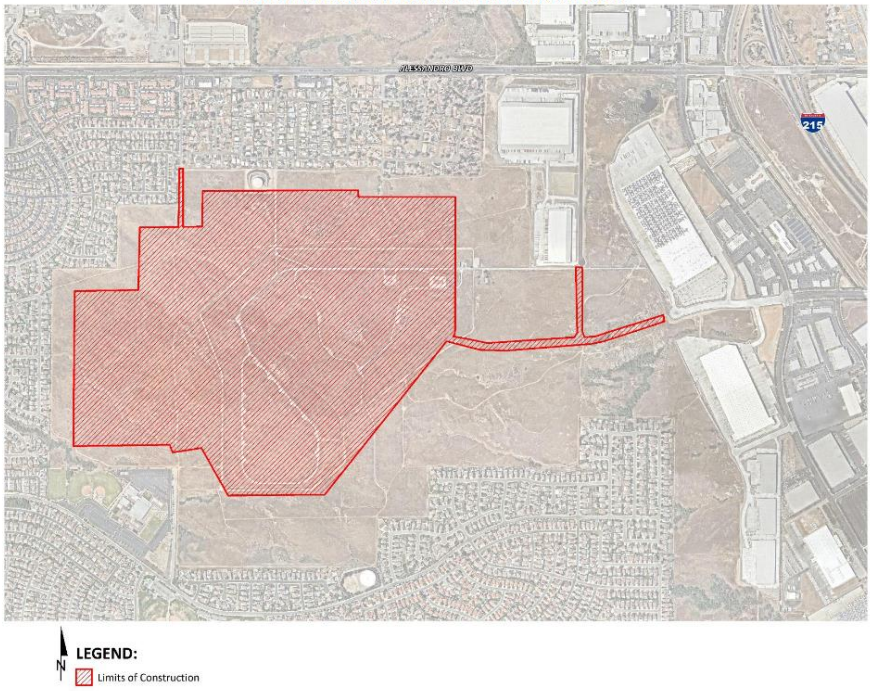


EXHIBIT 2-A: MODELED CONSTRUCTION EMISSION SOURCES



These three map types indicate different areas for different analyses, but also indicate that the different contractors responsible for each of these sections was provided different sets of information on the appropriate boundaries for modeling their section. The Biological Survey boundaries appear the most inclusive, and we believe those are the most reasonable for the overall construction analysis boundaries. However, we note that all construction boundaries exclude the water tank adjacent to residential homes

I-832.9
Cont.

in Orangecrest and associated trenches required to install underground reclaimed water pipes. In contrast, we believe that the construction boundaries for the Air Quality, Health Risk Assessment and Noise analyses are all too small, include no buffers that will be required for grading and building the roads and are a drastic underestimate. These construction boundaries are inappropriate.

Given that the proximity of residential zones and sensitive receptors is highly sensitive to the distance from the nearest residence to the construction zone, it is imperative that the modeled construction zones accurately reflect the project construction boundaries – especially near the Grove preschool where children under the age of 4 are particularly sensitive to these impacts.

I-832.9 Cont.

Project Boundary Inconsistencies

A few of the technical sections indicate deviations from the Project Boundary Map shown in the EIR on Figure 3-1. Of most importance, it is not clear from the Project Boundary Map whether there will be construction outside of the Project Boundary areas – especially on the two existing road connections with Barton Street North and South.

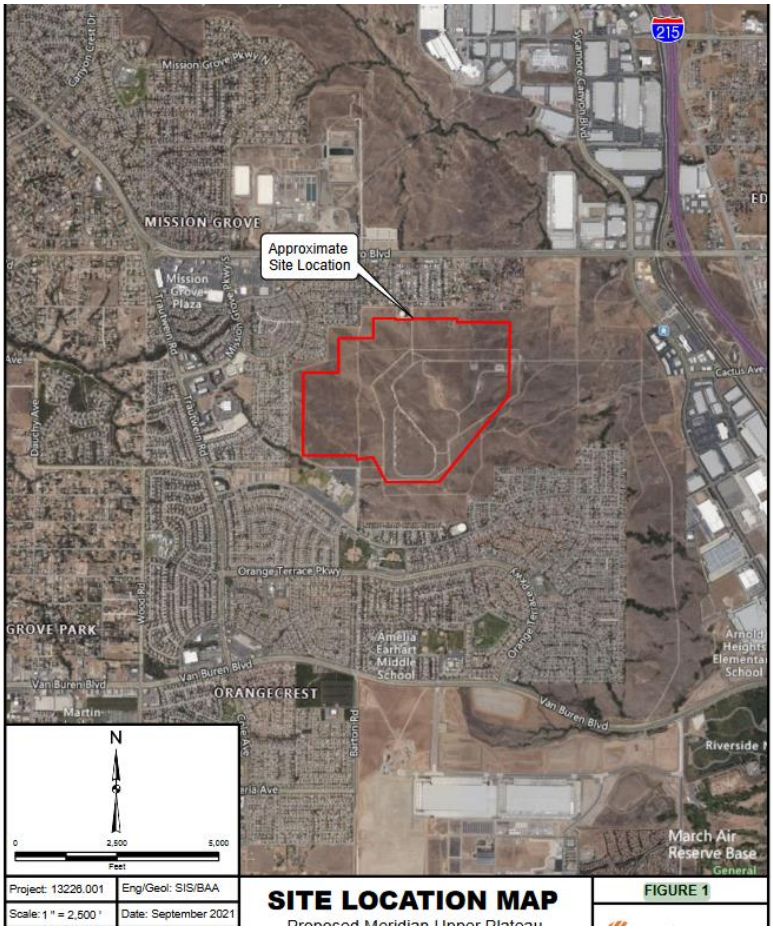
There are two primary types of inconsistencies. In the first, the Appendices G, J, and K all display inconsistent Project Boundaries compared to Figure 3-1. Specifically, these maps all display the 'Specific Plan Area' but exclude the road components and conservation easements in the project. Construction boundaries include the roadway segments which should be analyzed in the Geology Report, Environmental Site Assessment, and Hydrology sections. Roadway construction zones and operations need to be evaluated and analyzed as part of the assessment.

Figure 1 from Appendix G is displayed as an example. As can be clearly seen, Barton Street, Brown St. and the Cactus Avenue connector are excluded.

I-832.10

Finally, we note that the Appendix P2 Riverside Facilities Master Plan Appendix does not appear to include the West Campus Upper Plateau at all. As it clearly states in Table 2-18: The Meridian West Campus is only allocated for 16 acres of commercial development. This is the near-term development projections as of November 2021 for the period from 2020-2030.

I-832.11



We respectfully submit these comments in the hope that the unstable set of maps and inconsistent analyses performed across each of these EIR sections is corrected and applied consistently such that the full effects of the project can be evaluated by the community with certainty. As it stands, the multiple iterations of the project map are allowing the project applicant to apply slippery and inconsistent standards of what the project will be. This is sloppy and indicates an inattention to detail. It is likely the project applicant will be equally sloppy and inattentive when executing the project and its mitigation measures. Our neighborhood deserves a higher level of professionalism than the Lewis Group and its contractors have shown in this draft EIR.

I-832.12

I ask that the March JPA provide adequate evaluations of project impacts that are consistent throughout the draft EIR such that the community members can understand and accurately comment on the proposed project environmental impacts without unclear and inaccurate maps presenting inconsistent information on the Project.

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses


R-NOW

Letter I-832

Michael McCarthy
March 9, 2023

I-832.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-832.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. This comment cites general concerns about the Draft EIR but does not raise any specific issues on the adequacy of the environmental analysis in the EIR. No further response is required.

I-832.3 This comment discusses Figure 3-5, Project Site Plan and alleges the "Building A industrial zone" does not show 500,000 square feet of high-cube cold storage warehouse use and 725,561 square feet of warehouse use. The Project only includes site plans for Buildings B and C. There is currently no site plan proposed for the 56.27-acre Industrial parcel that the comment refers to as Building A. Since the ultimate location of the Cold Storage Warehousing is unknown at this time, it was estimated that Cold Storage usage could be allocated between Buildings B, C, and the remaining Industrial parcel (proportional to square footage of each building relative to the total amount of cold storage allowed), and the total number of truck trips associated with cold storage usage. The Draft EIR evaluated up to 500,000 square feet of cold storage, however, as a conservative measure, the Draft EIR's analysis assumed that the cold storage use could be located in either Building B, Building C, or the remaining Industrial parcel because it is not currently known in which buildings the high-cube cold storage warehouse land use would be located. Inconsistencies related to Figure 3-5 are corrected throughout the EIR, as noted in Response I-832.7 below.

I-832.4 This comment includes Figure 3-1 from the Draft EIR and notes the Project Boundaries. This comment does not raise any specific issues on the adequacy of the environmental analysis in the EIR. No further response is required.

I-832.5 This comment identifies that Figure 4.3-1 in Section 4.3, Biological Resources, of the Draft EIR as an example of the Project's Construction Boundaries. Please see Figure 3-11, Construction Limits, in Recirculated Chapter 3, Project Description. The comment references Figure 3-3, March JPA Zoning Designations, but it is unclear why as Figure 3-3 is not related to the Project's limits of construction.

I-832.6 This comment notes Project and Project Site Plan differences between Figure 4 in the Initial Study/Notice of Preparation (IS/NOP) included in Appendix A of the Draft EIR and Figure 3-5 in Chapter 3 of the Draft EIR.

Business Park: Following the release of the IS/NOP and public scoping period, revisions to the Business Park parcels in the most northern portion of the Specific Plan Area were made. These revisions involved reductions in parcel sizes and reductions in future building square footages on these parcels that are located closest to residences. Figure 3-5 correctly reflects seven smaller Business Park parcels instead of the four larger Business Park parcels shown in Figure 4 of the IS/NOP. The overall acreage of

Business Park has been reduced from 66.35 acres to 65.32 acres as a result of parcel line shifts since release of the IS/NOP.

Mixed Use: Following the release of the IS/NOP and public scoping period, revisions to the Mixed Use parcels in the western portion of the Campus Specific Plan Area were made. These revisions involved reductions in parcel sizes and splitting two larger parcels into five smaller parcels. Figure 3-5 correctly reflects five smaller Mixed Use parcels in the western portion of the Campus Specific Plan Area instead of the two larger Mixed Use parcels shown in Figure 4 of the IS/NOP. The overall acreage of Mixed Use has been reduced from 43.08 acres to 42.22 acres as a result of parcel line shifts since release of the IS/NOP.

Park: In response to community comments as well as consistent with the 2012 Settlement Agreement, following the circulation of the IS/NOP for the Project, the Park was increased to be 60.28 acres in size instead of 10 acres.

The comment suggests the Project does not conform to the City of Riverside Good Neighbor Guidelines because two of the Mixed Use parcels are within 800' of residential zoning. Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential, consistent with the City of Riverside's Good Neighbor Guidelines.

I-832.7 This comment provides a table identifying EIR figures that do not utilize the Project site plan as shown in Figure 3-5. The identified figures and exhibits within the Draft EIR, technical studies, and Specific Plan, have been updated to consistently reflect Figure 3-5. Despite the figure inconsistencies, the environmental analysis in the Draft EIR is based on Figure 3-5. These revisions do not constitute 'new information' under CEQA and do not impact the environmental analysis in the Draft EIR.

I-832.8 This comment alleges the Draft EIR must be redone because of the figures identified in Comment I-832.7. As discussed in Response I-832.7 above, figures and exhibits within the Draft EIR, technical studies, and Specific Plan have been updated to reflect what was accurately described and evaluated within the text of the Draft EIR and technical analyses. As such, these revisions do not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR. The comment also suggests inconsistencies with modeling of cold storage emissions. In response, please see Response I-832.3, above.

I-832.9 This comment alleges inconsistent construction boundaries throughout the Draft EIR. The figures cited by the comment are not meant to define construction boundaries; the figures are meant to show the evaluation of impacts for specific resources. Section 4.3, Biological Resources, explained Figure 4.3-1 identifies the areas of the Project site that would experience site disturbance plus a buffer to evaluate indirect impacts to biological resources. Plate 1 from Appendix E-2 of the Draft EIR does not delineate construction boundaries but identifies the Weapons Storage Area, which is the only built environment resource and the subject of Appendix E-2. Please see Figure 3-11, Construction Limits, of Recirculated Chapter 3, Project Description.

The comment alleges the Sensitive Receptor Location Map used for air quality and noise impacts (e.g., Figure 4.11-7) should have included a buffer similar to that used for biological resources. However, no noise or air emissions sources would be located within such a buffer as no construction activities are expected to occur there.

Regarding construction of the southern Barton Street extension, as shown in revised Exhibit 2-A of the Project HRA, the analysis placed construction sources within 80 feet of the Grove Preschool (represented by Receptor R8), and the modeling conservatively assumed that construction would occur at these locations for the entire 4.35-year duration of Project construction, although construction on the southern Barton extension adjacent to the preschool would take place over a significantly shorter period of time. The analysis determined there would be a less than significant impact. (Appendix C-4)

Regarding construction and installation of the water tank and water line, as shown on the revised Exhibit 2-A of the Project HRA, the closest sensitive receptor (Receptor 11) is 32 feet from construction activities, specifically the northern Barton Street extension and the Mixed Use parcels of the Specific Plan Area. Even with analyzed exposure of 4.35 years of construction emissions, the mitigated construction health risk at Receptor R11 is 0.56 in one million, well below the SCAQMD significance threshold of 10 in one million. As noted in the Final EIR and Project HRA, TACs generally dissipate with distance from the source. The homes along Grove Community Drive and Barton Drive in the vicinity of the offsite water tank construction and waterline installation would not be exposed to construction source emissions to the extent or duration compared to Receptor R11 – _the mitigated construction health risk would be below 0.56 in one million. Offsite construction would occur over a significantly shorter duration than construction of the Project itself. As such, since the mitigated construction health risk at Receptor R11, the maximally exposed individual receptor (MEIR), is well below the SCAQMD significance threshold, the Project will not cause a significant human health or cancer risk to nearby residences from any on-site or off-site construction activity. (Appendix C-4)

Additionally, the Project includes open space areas on which construction activities would not occur. As such, sources were not placed on these areas as no construction activities are expected to occur there. (Appendix C-4)

I-832.10 This comment alleges the Project's Geotechnical Exploration Report (Appendix G-1) did not analyze the construction of the Barton Street, Brown Street, and Cactus Avenue because these roadways were not depicted in the Report's figures. However, Section 4.7, Preliminary Pavement Design, of the Report provides specific recommendations for the construction of these roadway extensions. Leighton Geotechnical Response to Comments (Appendix G-2) confirmed the roadway extensions are suitable for the proposed development, from a geotechnical viewpoint.

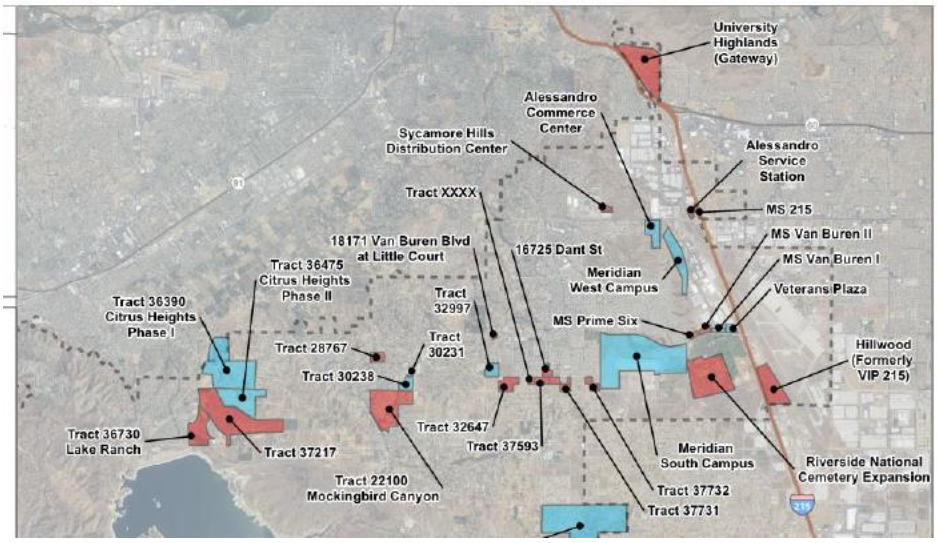
The comment also alleges Appendix J did not analyze the construction of the Barton Street, Brown Street, and Cactus Avenue because these roadways were not depicted in the included figures. The Draft EIR did not have an Appendix J; it is assumed the commenter is referring to the Project's Phase I and Phase II Environmental Site Assessments (ESAs; Appendices J-1 and J-2). As detailed in Recirculated Section 4.8, Hazards and Hazardous Materials, the proposed Barton Street extension was within the limits of the prior Phase I and Phase II ESAs completed by Leighton. No information was found in these assessments to indicate development along this proposed road extension alignment is likely to cause an unacceptable health risk to surrounding developments or future users of this roadway alignment.

Please see Recirculated Section 4.8, Hazards and Hazardous Materials for the analysis of the Brown Street and Cactus Avenue extensions.

The comment further alleges Appendix K did not analyze the construction of the Barton Street, Brown Street, and Cactus Avenue because these roadways were not depicted in the included figures. The Draft EIR did not have an Appendix K; it is assumed the commenter is referring to the Project's Preliminary Hydrology Study (Appendix K-1) and/or Master Project Specific Water Quality Management Plan (Appendix K-2). However, the figures in both Appendices include the full Project site and all three roadway extensions.

I-832.11 This comment alleges the Riverside Facilities Master Plan (Appendix P-2) only allocates 16 acres of commercial development to Meridian West Campus as near-term development for the period from 2020-2030. In the Master Plan, near-term projects are those that have approved Specific Plans or are in the design or construction phases, which would not include the proposed Project. The Master Plan is not referring to the Project, but rather the Meridian West Campus Lower Plateau project that has already been approved and under construction. This is clearly shown in Figure 2-16, Near-Term Development Location Map, of the Master Plan:

Figure 2-16: Near-Term Development Location Map



The Master Plan analyzed the Project site as 'mixed use' (see Figure 2-17, Undeveloped Parcel Location Map), which "are typically associated with more urbanized areas, where various buildings and activities result in higher water demand."

I-832.12 This comment summarizes what was raised in Comments I-832.1 through I-832.11. As discussed in Responses I-832.1 through I-832.11 above, figures have been updated to reflect what was accurately described and evaluated within the text of the Draft EIR. As such, these revisions do not constitute 'new information' under CEQA and does not impact the environmental analysis in the Draft EIR.

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Thursday, March 9, 2023 8:41 AM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: PlanningDocs.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

Attached please find a comment on the inconsistency of this Project with 30 years of planning documents adopted by the March JPA.

I-833.1

Please email me to confirm receipt of this public comment.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- General Plan of the March Joint Powers Authority[1], assumed 1999 date – last updated 2/17/2022 (General Plan, 1999)
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

I-833.2

Despite finding significant and unavoidable impacts, the EIR does not incorporate feasible mitigation, including basic mitigation measures such as electrified vehicles, solar panels, class IV bicycle lanes, and recommended warehouse setbacks. I respectfully submit these comments to urge the March JPA to correct its CEQA analysis and adopt a comprehensive plan that avoids the Project's significant impacts.

I-833.3

I. The PROJECT is inconsistent with the Final Reuse Plan 1996, General Plan 1999, Draft General Plan 2010, CBD 2012, JPA Ordinances #17-06 and #21-02, and the Consensus Community Land-use Preference of Existing Residents

[1] https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf

The Project Applicant has egregiously proposed a Project consisting of at least 4.7 million square feet of warehouses, including a minimum of 4 mega-warehouses each over 500,000 square feet. These industrial zoned warehouses are surrounded by buffer warehouses of 100,000 to 200,000 square feet size. This entire warehouse complex will be surrounded on more than three sides by residential communities ranging in distance from approximately 400 feet to 900 feet in distance from the closest warehouse. The entire warehouse complex is within ~1,500 feet of residential homes. This is inconsistent with a 25+ year history of planning process documents that have consistently and thoroughly repudiated the idea that industrial zoning was ever considered for this portion of the Meridian West Campus. This letter will show the historical planning record for each of those documents as being inconsistent with the Project.

I-833.4

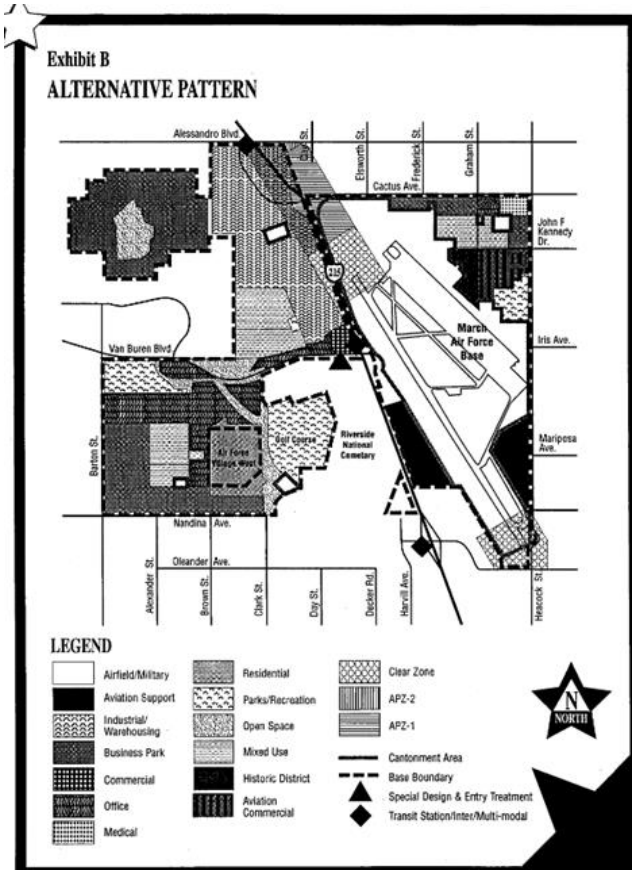
A. Final Reuse Plan

In the initial planning process, the Final Reuse Plan, 1996 describes how the community was included in the planning of land-uses.

"*With the formulation of the Land Use Plan, the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to* ***maximize the opportunity for citizen involvement with base reuse***" (Final Reuse Plan, 1996, p. II-v).

I-833.5

In the Final Reuse Plan, there were multiple community stakeholder meetings to identify preferred land-use plans. Four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows that industrial land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. Business Park land-uses include 'administrative, financial, commercial service, governmental and community support services, research and development centers; light manufacturing; vocational education and training facilities; business and trade schools; and emergency services.'



Exhibits C and D identify the entire West Campus as Stephen's Kangaroo Rat management areas and Exhibit A has fewer industrial warehouses due to the suggested land-use of a theme park next to the freeway.

I-833.5 Cont.

B. General Plan 1999

The March JPA General Plan 1999 clearly sets forth the planning mandates of the March JPA. Among its most prominent Land Use Policies are Goal 2, Policies 2.3 and 2.4 which state that the land uses should '*discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions*' and '*Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses.*'

This language is completely consistent with the Final Reuse Planning Process. Similarly, the land-use plan Table 1-1 gave a specific Buildout plan for the March JPA planning area. In it, the Land-use designations are listed. It is included below. A total of 433 acres were initially designated for Industrial zoning. However, in each successive adoption of Specific Plans by the March JPA, the fraction of land devoted to Industrial zoning increased. The increase in Industrial use over time is shown in Figure 1 and as clearly shown, the acreage devoted to the most intensive zoning has gone from 433 acres in 1999 to an estimated 923 acres with the proposed Specific Plan 23-09. This is more than a doubling of the original land-use plan and there has been no consultation or revision of the General Plan in the intervening 24 years to determine if this is consistent with the interests of, and existing commitments to, adjacent residents, property owners, and local jurisdictions.

I-833.6

TABLE 1-1
BUILDOUT MARCH JPA PLANNING AREA

Land Use Designation	Acres GROSS	Density MAX.	Density AVG.	Buildout Capacity*
INDUSTRY				
Business Park	1278	.75	.20	7,793,755 sf
Industrial	433	.60	.15	1,980,455 sf
SUBTOTAL				9,774,210 sf
COMMERCE				
Office	104	.75	.30	951,350 sf
Mixed Use	360	.60	.25	2,744,280 sf
Commercial	45	.60	.30	411,642 sf
Destination Recreation	135	.50	.25	1,029,105 sf
SUBTOTAL				5,136,377 sf
PUBLIC				
Park/Recreation/ Open Space	777	.25	.025	592,307 sf
Public Facility	449	.50	.10	1,369,091 sf
SUBTOTAL				1,961,398 sf
SPECIAL				
Military Operations	2102	n/a	n/a	2,500,000 sf
Aviation	316	.40	.15	1,445,321 sf
Historic District	58	2du/ac	2du/ac	111 units
AFVW Expansion	75	.60	.30	686,070 sf
Cemetery Expansion	160	.10	.005	24,394 sf
SUBTOTAL				4,655,784 sf 111 units
TOTAL				21,527,769 sf 111 units

I-833.6 Cont.

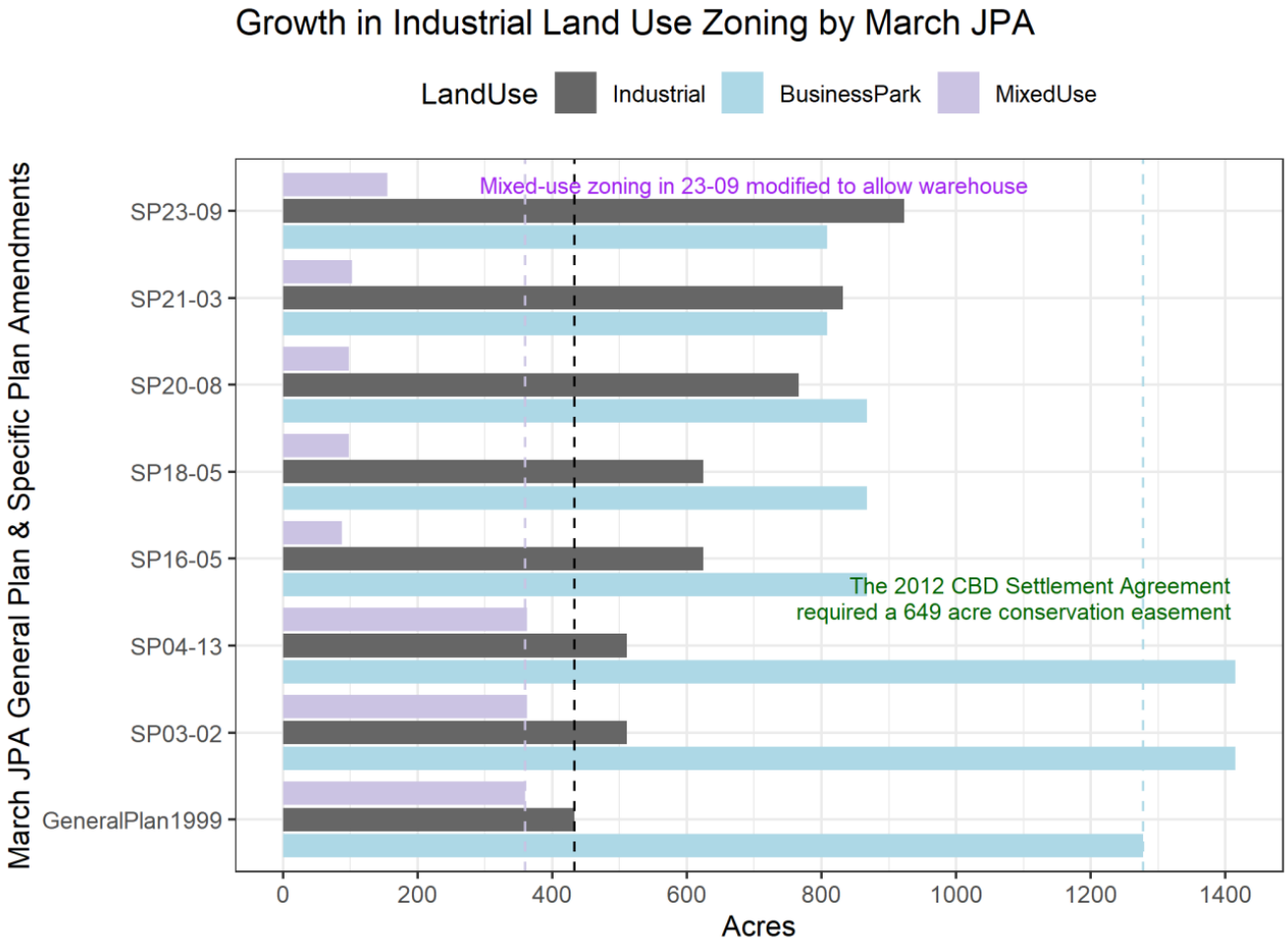


Figure 1. Change in Industrial Land-Use allocated at the March JPA in chronological order by JPA Specific Plan. The amount land-use allocated to the most intensive Industrial zoning has increased from the original 433 acres in 1999 to the current 832 acres (SP21-03) and a projected revision to 923 acres if SP23-09 is adopted for the West Campus area.

I-833.6 Cont.

Finally, I note that the Specific Plan for this campus changes the definition of the Mixed Use land category. In the existing General Plan (1999), Mixed-Use is explicitly defined on page 1-34.

'Mixed uses include a variety of complementary land uses; including commercial, business park, office, medical, educational and vocational, research and development, and services. Industrial ***and major warehousing*** *uses are excluded.'*

In the Draft Specific Plan (2023), p. 2-4, Mixed use is now defined as,

"Mixed uses include a variety of complementary land uses, including commercial, business park, office, medical, research and development, business enterprise, and services. Industrial, and outdoor storage is prohibited."

'*Major warehousing*' uses are now acceptable to the March JPA in the Mixed Use zoning, despite a 24 year precedent in its 1999 General Plan definition that excluded this use. I interpret this change as deceptive and deliberate in its cynical attempt to mask the project's intent to build as many warehouses as close to residential zoning as possible.

I-833.7

Lastly, we note that the Transportation element from the General Plan, as shown in the Draft EIR, Figure 4.15-2 does not include Barton Road and does not include Cactus Avenue continuing through to Barton Road. Thus, the proposed circulation plan for the project is inconsistent with the General Plan.

- there is no General Plan basis to connect Barton Road between Camino Del Sol and Grove Community Drive.
- There is no General Plan basis to have Cactus Avenue proceed further west than Camino del Oro.
- There is no General Plan basis to connect Brown St. to Cactus Avenue.

I-833.8

Therefore, the Project creates significant and unavoidable conflicts with LU-1 – Conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project and TRA-1 – Conflict with a program plan, ordinance, or policy addressing the circulation system.

C) Draft General Plan – 'Vision 2030' – 2010

In addition to the original planning documents governing the March JPA, a Revised General Plan was drafted around 2010. Despite never being adopted, it provides insight into the thought process of the planning staff at a time of major economic turmoil during the great recession.
Despite the desperate need for jobs and the problematic economy, it still clearly indicated a desire to avoid incompatible warehouse land uses adjacent to residential homes.

Section 2.2.25(d): "*Any and all future distribution/warehouse development in the Meridian West area shall maintain a 1000' distance from existing residential uses in accordance with the Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities. (See 2.1.4 of the Land Use Element).*"

Section 2.2.24: "*The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high paying jobs while protecting the environmental resources located therein.*
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high paying jobs (such as corporate offices), high technology jobs, and jobs related to the green building industry are preferred.

I-833.9

D) Centers for Biological Diversity Settlement Agreement – 2012

In the Appendix S - CBD 2012 document, p.31/32 of the document contains a flyer about the Meridian campus co-published by LNR and March JPA. In it, the 7th bullet states, '*the MJPA enforces the WRCOG Good Neighbor Guidelines for the siting of warehouse and distribution use near residential communities.*'

The WRCOG Good Neighbor Guidelines[2] were adopted in 2005 and establish criteria for siting warehouse and distribution centers away from adjacent residential uses. Policy members include Ron Loveridge, Mayor of Riverside, Penny Newman – Executive Director of CCAEJ, and others. It defined a

I-833.10

[2] https://wrcog.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId=

goal to minimize the impacts of diesel PM from on-road trucks associated with warehouses on existing communities and 'sensitive receptors'. Sensitive receptors were defined to include residential communities, parks, playgrounds, schools, hospitals, nursing homes, day care centers, and other places where residents were likely to spend time.

The #1 Goal of the WRCOG GNG was to minimize diesel exposure to neighbors in close proximity to warehouses/distribution centers. The recommended strategy was to '*create a buffer zone of at least 300 meters (~1000 feet, can be office space, employee parking, greenbelt) between warehouse/distribution center and sensitive receptors*'.

The Specific Site Plan for this project completely ignores the WRCOG GNG guidance. More on that in Section E below.

I-833.10 Cont.

Finally, the March JPA never amended the Land Use Plan of the March JPA to reflect the terms of the 2012 settlement agreement, while developing piecemeal portions of the lands subject to the 2012 Settlement agreement in the Meridian West Lower Plateau through JPA ordinance #17-04[3]. At no time between 2012 and 2023 has the March JPA amended its General Plan or Land Use Plan to reflect the terms of the 2012 Settlement Agreement, the agreed upon conservation easement, or the proposed acreages zoned for business park, park/recreation/open space, and industrial agreed upon through the terms of that Settlement Agreement.

The failure to update the Land Use Plan of the March JPA to reflect the 2012 Settlement Agreement indicated that the General Land Use Plan has been in conflict with legal settlements for over a decade. That failure should be fixed through an amended land use plan that reflects existing commitments of the March JPA rather than piecemeal attempts to redesignate the land use plan through the West Campus Upper Plateau project. Thus, we believe that the existing land use plan is in conflict with LU-1 given the existing legal commitments entered into the March JPA in 2012.

I-833.11

E) JPA Ordinance #17-06 and #21-02

In 2017, the March JPA adopted #17-06 truck route ordinance implementing mitigation measures within the March JPA Planning Area.

On p.1, last paragraph and first paragraph on p.2 are quoted verbatim;

> *Whereas, the March JPA has determined that commercial truck travel by vehicles with gross weights over 5 tons can produce negative impacts on surrounding residential neighborhoods*.
>
> *Whereas, this Ordinance seeks to implement objectives of the 'Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities' distributed and promoted by the Western Riverside Council of Governments…*

Implementing objectives of the Good Neighbor Guidelines (GNG) was reaffirmed in JPA Ordinance #21-02.

I-833.12

[3] https://ceqanet.opr.ca.gov/2016061020/5

The primary goal of the truck route ordinance was to establish truck routes that avoided residential streets in neighborhoods, designate truck routes, establish signage for truck routes, and allow vehicles to be weighed. However, it is not stated that the Ordinance is intended to only implement the objectives for truck routing.

As a result, the goals of the WRCOG GNG that apply include #1 Establish buffer zones of at least 1,000 feet (warehouses are within 400 feet), #5 Establish a diesel minimization plan to be implemented with new projects (not provided in the DEIR), and #7 Establish a public outreach program and conduct periodic community meetings to address issues from neighbors (not provided in the DEIR or by the March JPA).

I-833.12 Cont.

Therefore, I submit that the March JPA Ordinance is consistent with its historical planning documents from 2010 (draft general plan) and 2012 (CBD settlement agreement). However, the Project is again in conflict with existing JPA ordinances in conflict with TRA-1 and LU-1.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), Draft General Plan (2010-never adopted), CBD Settlement Agreement (2012), and JPA Truck Route Ordinances (2017, 2021) are clear and consistent in considering warehouse uses inappropriate to site next to residential zoning. Moreover, the West Campus Upper Plateau Specific Plan area was never considered for intensive Industrial/Warehousing uses. All discussion of warehouse uses focused on appropriate setbacks of at least 1,000 feet to protect adjacent residential zoning. Initial business park zoning was intended to allow mixed uses that are compatible with adjacent residential communities – not warehouse uses only and certainly not mega-warehouses of over half-a-million square feet.

I-833.13

F) Community Preference 2022 and 2023

Finally, the record from the current project community 'engagement' is clear. As soon as the surrounding neighborhoods were notified in February 2022 that the Project was planned, opposition was immediate and unanimous. An organized community group spontaneously formed (Riverside Neighbors Opposing Warehouses) and started advocating for alternative plans that did not include warehouses for the West Campus Upper Plateau. The community engaged with the developer in meetings as listed below.

- February 2022 – Zoom meeting – Community comments are opposed but it is a zoom meeting with no open questions from the community moderated by Adam Collier of the Lewis Group and Dan Fairbanks of the March JPA who evaded community questions and indicated a complete lack of community involvement in the initial planning process for the Project.
- April 2022 – RNOW, Developer, March JPA meeting in person at March JPA– RNOW, March JPA, and Developer met at the March JPA to discuss the project. RNOW members again asked for non-industrial alternatives to be considered in the planning process, including residential, commercial, solar farms, etc.
- August 2022 – Developer open house at the March Air Force Museum – Over 100 community members attended and opposition was at least 9:1. Multiple community members submitted written comments which were neither published nor addressed by the developer in the project planning process.

I-833.14

- February 2023 – Developer Engagement meeting during the draft EIR – Another presentation at the March Air Force Museum – About 10-20 community members attended. Most did not stay for long. As noted by the Developer, this was not part of the formal EIR process and comments submitted would not formally be included. As such RNOW advised community members that the process was not formal and was merely informational.

In addition to the developer hosted meetings, the RNOW group submitted a petition to the March JPA with multiple thousands of signatures indicating opposition to the West Campus Upper Plateau in May. Community members have attended March JPA meetings and given dozens of public comments including over 40 public comments at the single night meeting held in Moreno Valley Community Center. Community members have given public comment at multiple Riverside City Council meetings and at a Moreno Valley City Council meeting in October.

March JPA commissioners have received hundreds of emails in opposition to this project. They have received public testimony in writing and verbally. Community comment has been clear and consistent – the project is completely against community wishes and preferences. It will harm the community, cause decades of noise and pollution, and ultimately drive down property values and harm the region economically. Ownership of these mega-warehouses will be by outsiders and there will be no value because the jobs provided will not provide sufficient wages to live in the neighborhoods adjacent to the warehouses.

Thus, the Project land use conflicts with community preference, which is specifically incorporated into the General Plan through Specific Policy 2.3 and 2.4 as noted earlier. I believe that this is again a conflict with LU-1 – conflict with existing land use plan, policy, or regulation of the March JPA adopted for the purpose of mitigating or avoiding an environmental effect.

I-833.14 Cont.

G) Summary

The March JPA has produced a remarkable set of documents over nearly 30 years of the planning phase for this piece of land. In my reading, they are incredibly consistent in showing that this land has no historical indication of being sited for warehouses. It is also clear that the goals of the March JPA clearly indicate that projects should defer to local community preference when determining land-uses that may harm residents of the area.

The homes surrounding this project are 50+ years old in the Camino del Sol neighborhood, 30 years old in parts of Orangecrest, and 20+ years old in Mission Grove. These are long-term communities with residents who have lived near March ARB and the March JPA for decades. The community has been active and engaged in all parts of the planning process for this project since being notified and have repeatedly asked that the March JPA follow its own guidelines for developing this land.

I-833.15

I ask that the March JPA address its deficiencies in the planning process that suggest that this land is compatible with adjacent residential uses, a park, and a church. Industrial zoning is incompatible with these uses and the March JPA's own planning documents indicate that this project is a cynical attempt to upzone a parcel to a use that will not enhance the community or provide any local community benefit. The March JPA has embarked on being a bad neighbor to our communities and has failed to respond to consistent, unanimous community feedback on redeveloping this public land to benefit the local neighborhoods that are adjacent to it. The cynical way in which the March JPA has gone about checking the box of the CEQA process while ignoring all community feedback on the best use of this land

is corruptive of public trust and unsuitable for a public agency. The public process should not betray residents and business interests to private developers developing land for-profit within a public land redevelopment process. This is not private land and this Project draft EIR is a perversely Orwellian version of doublespeak when it false claims to be consistent with March JPA goals and policies. Please do not betray our neighborhoods interests by moving forward with this egregious Project.

I-833.15 Cont.

Sincerely,
Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses



Letter I-833

Michael McCarthy
March 9, 2023

I-833.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-833.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8 - Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. The comment summarizes the documents reviewed by the commenter.

I-833.3 This comment alleges the Draft EIR does not incorporate feasible mitigation. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Please see Recirculated Section 4.2, Air Quality, for a discussion of the revised measures. Regarding fleet electrification, MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed. Regarding solar, MM-GHG-1 requires rooftop solar photovoltaic (PV) electricity generation sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. Regarding bike lanes, the proposed Specific Plan includes Class II, 6-foot dual bike lanes on all Specific Plan Area roadways. Regarding warehouse setbacks, please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the Project's consistency with the Good Neighbor Guidelines for the County of Riverside and Topical Response 4 – Project Consistency for a discussion of the Project's consistency with the City of Riverside Good Neighbor Guidelines.

I-833.4 This comment inaccurately describes the Specific Plan buildout scenario land uses analyzed in the Draft EIR. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment alleges the Project would have "a minimum of 4 mega-warehouses

each over 500,000 square feet." Based on the maximum floor area ratio (FAR) under the proposed Specific Plan, only the three industrial parcels are large enough for warehouses over 500,000 square feet. The comment further alleges "buffer warehouses of 100,000 to 200,000 square feet in size" within 400-900 feet of residences. Based on the maximum floor area ratio (FAR) under the proposed Specific Plan, the Business Park and Mixed Use parcels could have buildings, not necessarily warehouses, ranging from approximately 62,000 square feet to 214,000 square feet. Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. Since the adoption of the March JPA General Plan in 1999, the Project site has been designated for development. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. Thus, the Project designates more land for non-development uses and does not introduce new designated uses.

I-833.5 This comment discusses the March Air Force Base Master Reuse Plan and the alternative land use plans included therein. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the role and purpose of the Master Reuse Plan.

I-833.6 This comment discusses the March JPA General Plan and redesignation of land uses since its adoption. The March JPA General Plan includes warehousing in the definition of Business Park uses. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space.

I-833.7 This comment questions whether the proposed Specific Plan's definition of Mixed Use is consistent with the General Plan's definition regarding warehousing. The March JPA General Plan excludes "major warehousing uses" from Mixed Use designated parcels. The proposed Specific Plan includes business enterprise within the Mixed Use designation. Business enterprise use is not major warehousing and is intended to provide a transitional environment that allows for limited commercial and office uses in conjunction with small scale industrial warehouse activity. Under Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. The proposed Specific Plan's Mixed Use definition is consistent with the March JPA General Plan.

I-833.8 This comment alleges the Project is inconsistent with the March JPA General Plan Exhibit 2-1, Transportation Plan (Planned Roadway/Street System. As detailed in Recirculated Chapter 3, Project Description, the requested General Plan Amendment 21-01 would, in part, amend Exhibit 2-1, as well as the Circulation Element of the General Plan, to incorporate the circulation system revisions proposed by the Project. The Project is consistent with the March JPA General Plan. As discussed in Section 4.15,

Transportation, of the Draft EIR, the Project would result in construction-related traffic deficiencies that could result in a significant impact to the circulation system. To reduce this potential impact to less than significant, MM-TRA-1 (Construction Traffic Management Plan) is required to be implemented. In addition, potential traffic operational impacts related to potential speeding and pedestrian safety were identified, and the implementation of MM-TRA-2 (Barton Street Traffic Safety Plan) would reduce potential impacts to less than significant. No significant and unavoidable traffic impacts would occur with the implementation of the proposed Project.

I-833.9 This comment alleges the Project is inconsistent with the unadopted draft update to the March JPA General Plan. This update was never adopted and is not applicable to the Project.

I-833.10 This comment cites a flyer attached to the 2012 CBD Settlement Agreement and alleges the Project is inconsistent with the WRCOG Good Neighbor Guidelines. That reference does not constitute adoption of the WRCOG Good Neighbor Guidelines. Recirculated Section 4.10, Land Use and Planning, includes a consistency analysis with the County of Riverside Good Neighbor Guidelines.

I-833.11 This comment states the existing March JPA General Plan land use designations for the Project site are inconsistent with the land use plan set forth in the 2012 CBD Settlement Agreement. As detailed in Recirculated Chapter 3, Project Description, the requested General Plan Amendment 21-01 would, in part, amend the Project site's General Plan land use designations to conform with the 2012 Settlement Agreement.

I-833.12 This comment asserts March JPA has adopted the WRCOG Good Neighbor Guidelines through JPA Ordinance #21-02. JPA Ordinance #21-02 references the WRCOG Good Neighbor Guidelines in a recital. That reference does not constitute adoption of the WRCOG Good Neighbor Guidelines. JPA Ordinance #21-02 does implement Goal 2 of the WRCOG Guidelines: Eliminate diesel trucks from unnecessarily traversing through residential neighborhoods. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Recirculated Section 4.10, Land Use and Planning, includes a consistency analysis with the County of Riverside Good Neighbor Guidelines.

I-833.13 This comment claims the Project site was never intended to be an industrial zone. The March JPA General Plan designates the Project site as Business Park, Industrial, and Park/Recreation/Open Space. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover,

wholesale, storage and distribution are expressly identified as allowed uses within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses.

I-833.14 This comment questions public engagement. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the project site resulting in 2,172 public notices. With regard to an alternative without warehouses, please see Topical Response 8 – Alternatives, which includes the analysis of Alternative 5 – Non-Industrial Alternative.

The comment further alleges the Project is inconsistent with JPA General Plan Policies 2.3 and 2.4, creating a conflict under Threshold LU-1. CEQA Guidelines Section 15125(d) requires EIRs to discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans. However, an inconsistency does not necessarily mean a potentially significant conflict under CEQA. Threshold LU-1 asks: Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? So, unless (1) the applicable plan, policy or regulation was "adopted for the purpose of avoiding or mitigating an environmental effect" and (2) the conflict would cause a significant environmental impact, any inconsistency would not be a potentially significant conflict under CEQA. The comment cites General Plan Policies 2.3 (Support land uses that provide a balanced land use pattern of the Planning Area, and discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions) and 2.4 (Protect the interests of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses). These policies do not avoid or mitigate an environmental effect so any inconsistency would not be considered potentially significant under CEQA.

I-833.15 This comment is conclusory in nature and summarizes previous comments. This comment does not raise any additional issues, questions or concerns about the adequacy of the environmental analysis included in the Draft EIR not addressed in previous responses. As such, no further response is provided.

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Thursday, March 9, 2023 8:56 AM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: CumulativeImpacts.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

Attached please find a comment on the Cumulative Impacts Projects List scoped in the draft EIR. I think you will find my list a bit more comprehensive. I-834.1

Please email me to confirm receipt of this public comment.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within ~1,600-foot range of residential homes.

I-834.2

The draft EIR describes the Cumulative Impacts methodology in Section 4.0, lists the geographic scope of analysis in Table 4-1 and lists the projects considered for cumulative impacts in Table 4-2. Upon review, Table 4-2 omits tens of millions of square feet of past, present, and probable future warehouses projects approved by March JPA and its member agencies within the geographic area defined in Table 4-1. This letter provides a broader list of suggested projects to include for both Immediate Vicinity Projects and Regional Projects.

First, I note that the draft EIR omitted Figure 4-1, cited on page 4-4 of the draft EIR, which is the cumulative impacts map figure. I have assumed for the purposes of this comment letter that the Cumulative Impacts map listed as Exhibit 4-5 in Appendix N is correct, although I note that it does not include many of the 'ID' codes listed in Table 4-2.

I-834.3

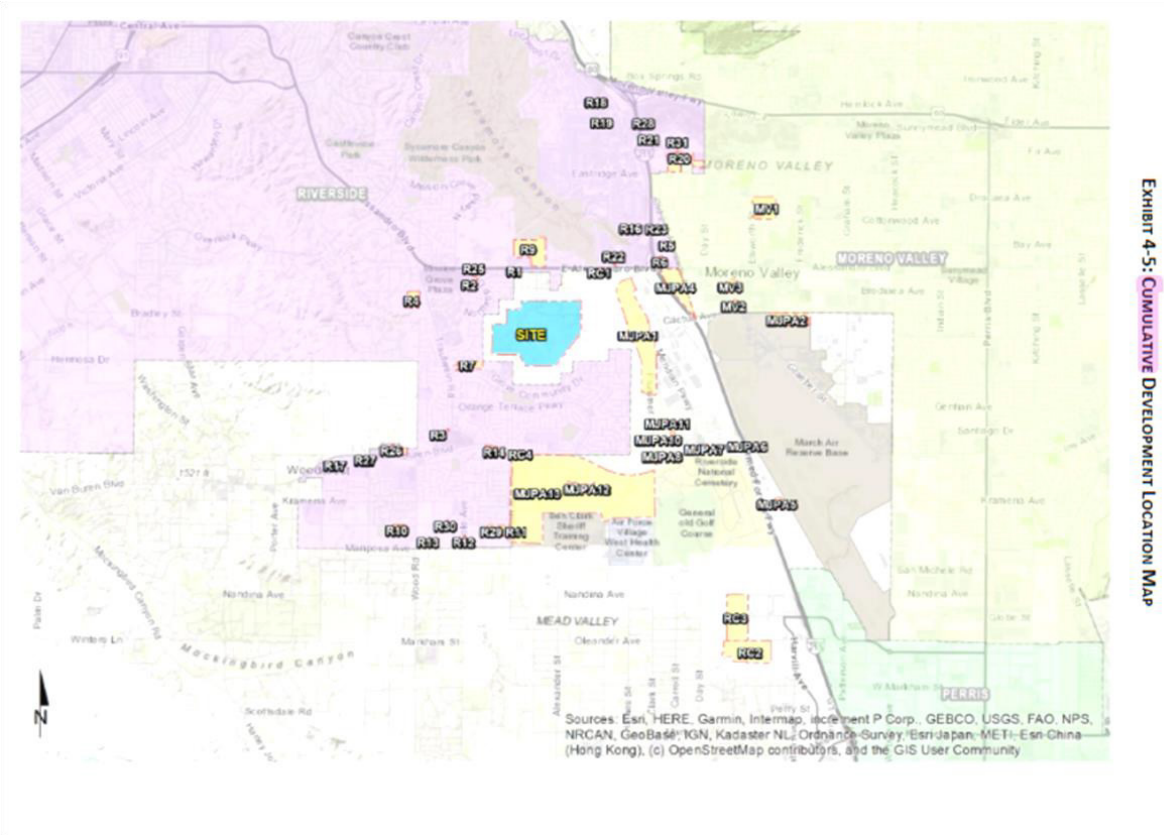


EXHIBIT 4-5: CUMULATIVE DEVELOPMENT LOCATION MAP

Appendix N- Exhibit 5

The entire table of projects listed in Table 4-2 includes projects from the March JPA, City of Riverside, City of Moreno Valley, and Unincorporated County. No projects from the City of Perris are mentioned.

I-834.3 Cont.

Immediate Vicinity Project List is Incomplete

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

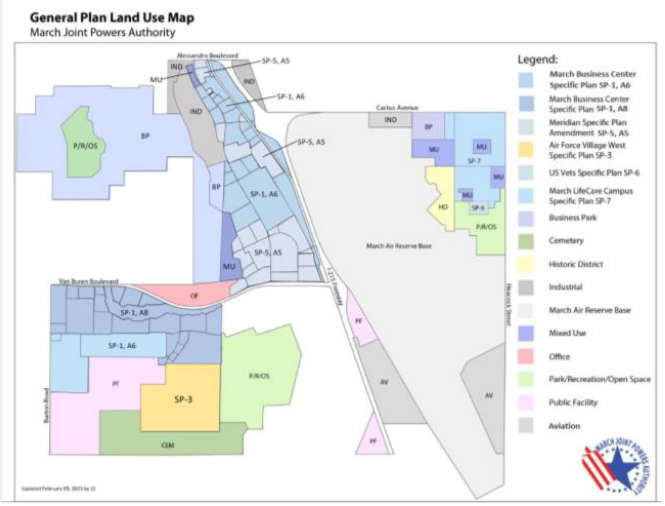
On page 4-3, it states, 'Unless otherwise indicated in the analysis in Chapter 4 of this Draft EIR, the geographic scope used in the cumulative analysis includes the March JPA planning area.' It is obviously clear that the March JPA planning area is not completely included in the Table 4-2 cumulative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

I-834.4

Our best estimate is that the March JPA has an existing warehouse footprint (i.e., parcel size)[1] of approximately 23 million square feet, with an estimate square footage of approximately 12 million square feet. Multiple warehouse and industrial facilities within the March JPA Meridian Specific Plan SP-5, A5, Specific Plan SP-1, A6, and aviation facilities associated with commercial

[1] Note, this is not the building square footage, but the building and associated pad/parking lots/docks and landscaping.

cargo operations and the proposed Meridian D-1 Aviation Gateway are left off the March JPA planning area cumulative impacts list. These are clearly visible in the March JPA General Plan Land Use Map



March JPA General Plan Land Use Map – February 2023.

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

I-834.4 Cont.

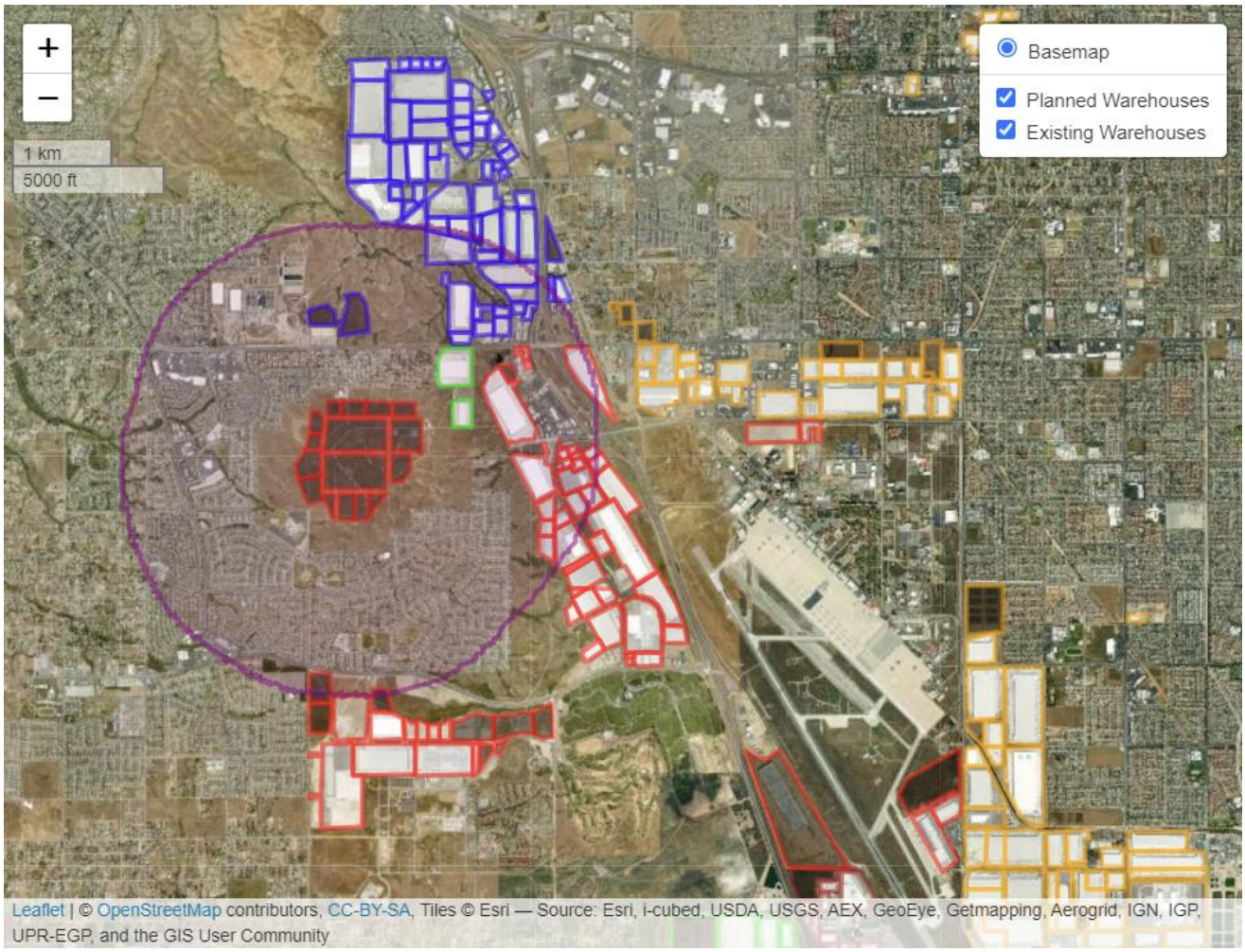


Figure 1 - Map of project area, surrounded by a 1-mile buffer. Warehouse colors indicate the jurisdiction responsible for land-use authority, while the fill indicates an existing (white) or planned/approved (gray) warehouse project.

I-834.4 Cont.

Table 1 – Immediate Vicinity Analyses that should include all 1-mile warehouses and adjacent Truck Routes (March JPA, County, City of Riverside).

Environmental Resource	Geographic area	List of Projects and Truck Routes
Aesthetics	1-mile	Table 2 List
Air Quality (Toxic Air Contaminants, odors)	1-mile	Table 2 List
Noise (Construction Phase)	1-mile	Table 2 List
Noise (Operational)	1-mile	Table 2 List

I-834.5

Specifically, the Table 1 project areas should be analyzed to include the truck routes, freeway, and warehouses within 1-mile of the project site for cumulative impacts on aesthetics, air quality, and noise. Thus, I ask that these analyses explicitly model the air quality from the loading bays of the 44 warehouses in this list, the five truck route arterial roads, and the 215 Freeway – in addition to- the modeling of the 21 warehouses planned for this project. That is the 'Immediate Vicinity' cumulative impact of warehouses on our local air quality. Moreover, I ask that the construction phase noise

I-834.6

operations include the likely noise from construction of other 'under construction projects' including Sycamore Hills Distribution Center, Meridian South Campus Buildings F, G, and 1, and Meridian West Building 4.

I-834.6 Cont.

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

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

I-834.7

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

I-834.7 Cont.

Regional Impacts

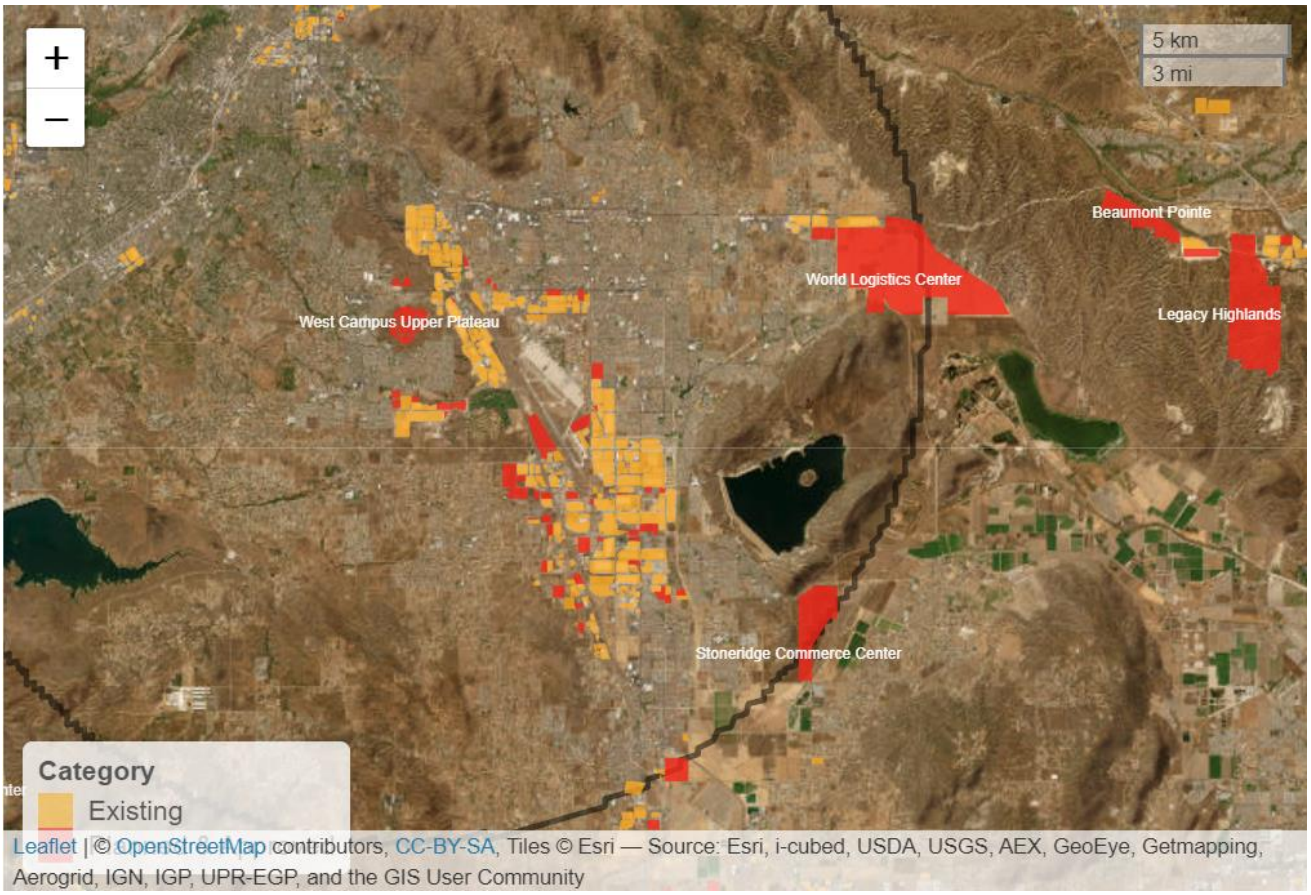
In addition to immediate vicinity geographic impacts, multiple environmental resources drastically underestimated the regional impact of past, present, and probable future projects on the 215/60 Corridor area. For completeness, Table 3 shows the list of environmental resources that should be analyzed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

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

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

I-834.8

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



I-834.8 Cont.

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

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

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

The World Logistics Center is breaking ground in 2023. It will be developed in two phases over approximately 12 years and will include 40 million square feet of warehouses and over 19,000 daily truck trips when fully built out. Its environmental impact report suggested it would generate 35,000 jobs[2].

The Stoneridge Commerce Center has been approved by Riverside County. It is over 9.5 million square feet of warehouses and was projected to generate over 10,000 jobs[3] and nearly 4,000 truck trips.

These two very large projects are projected to generate 45,000+ jobs and 23,000 daily truck trips, most of which will travel on the 215/60 corridor. While these are two of the largest projects in the region –

[2] DEIR- https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32.
[3] DEIR- v_DUvTq0wy7zyk_ATUd1e_ywhJKJznH0Y5OLgU21nc43u6Hte84WB6Ia_vn9Rnu3c3NsFZDe9vF_31qm0 (ca.gov) – p. S-63

together they account for 109 million square feet of the total footprint – they are just slightly more than 52% of the planned and approved warehouses in the 215/60 corridor within 10 miles. Another 100 million square feet of footprint is also approved. I list the projects below, along their approximate footprint for review. Our region will be adding an enormous number of warehouses to a region that is already overwhelmed by truck traffic and pollution and does not have the existing local workforce or housing to support this continued growth in industrial projects.

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

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

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

I-834.8 Cont.

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

I-834.8 Cont.

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

I-834.8 Cont.

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

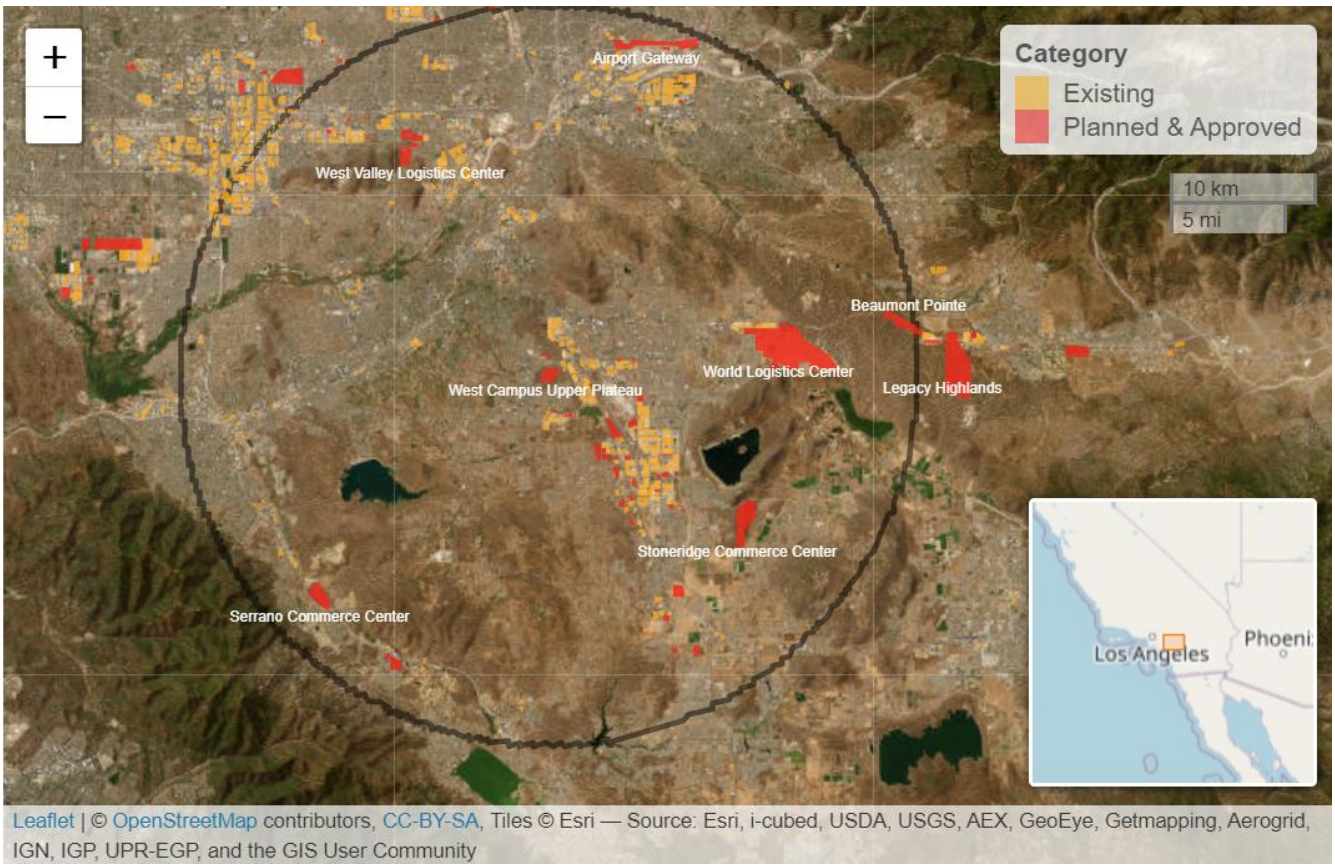
In total, the existing and approved acreage of warehouses built and approved in the last 5 years has been enormous in the region. As a result, regional analyses of warehouses, traffic, jobs, population, and air quality that are not current will drastically underestimate the regional impacts of warehouses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

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

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

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

I-834.8 Cont.



I-834.8 Cont.

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

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

R-NOW

Letter I-834

Michael McCarthy
March 9, 2023

I-834.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-834.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

The comment questions the scope of the cumulative projects included in Table 4.2 of the Draft EIR. For a discussion regarding the selection of the cumulative projects, please see Topical Response 7 – Cumulative Projects.

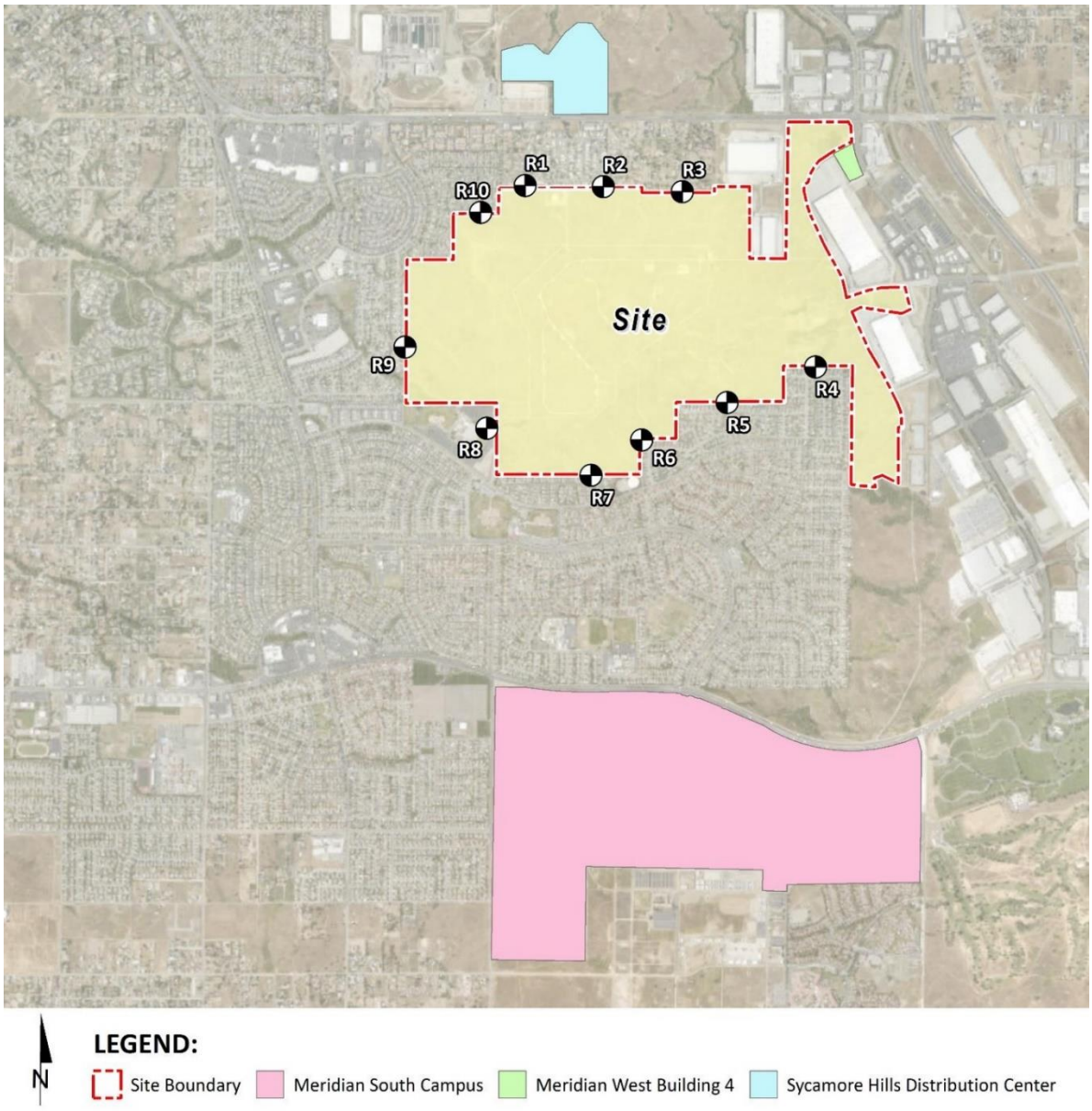
I-834.3 This comment identifies the inadvertent omission of Figure 4-1, Cumulative Development Location Map. This figure has been included in the Final EIR. Table 4.2 includes cumulative development projects within 5 miles of the Project site. The figure included in the Traffic Scoping Agreement (Appendix N-2) does not show the full 5-mile radius in order to show the projects in the immediate vicinity. Therefore, not all projects listed in Table 4.2 are shown in the figure. The comment questions the scope of the cumulative projects included in Table 4.2 of the Draft EIR. For a discussion regarding the selection of the cumulative projects, please see Topical Response 7 – Cumulative Projects.

I-834.4 This comment raises concerns regarding the geographic scope used to evaluate Project impacts on transportation in the Draft EIR. In response, please see Response FL-G.4. For a discussion regarding the selection of the cumulative projects, please see Topical Response 7 – Cumulative Projects. Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. Table 4.1 has been revised in the Final EIR.

I-834.5 This comment raises concerns regarding the cumulative analysis and adjacent truck routes. See Recirculated Section 4.2, Air Quality, for cumulative air quality impacts along adjacent truck routes. With regard to cumulative projects, please see Response FL-G.4 and Topical Response 7 – Cumulative Projects. Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. Table 4.1 has been revised in the Final EIR.

I-834.6 This comment requests cumulative construction noise analysis of other "under construction projects" including Sycamore Hills Distribution Center, Meridian South Campus Buildings F, G, and 1, and Meridian West Building 4 as shown below on Exhibit A. As explained in UXR Noise Response to Comments (Appendix M-2), since noise levels diminish quickly at a rate of 6 dB for each doubling of distance from a source, the potential cumulative construction noise source activities are expected to be lower than the Project related construction noise levels. This is largely due to distance, topography,

intervening building structures and development between the nearest noise sensitive receiver locations and the potential "under construction projects". Using the same reference construction equipment noise levels published by the Federal Highway Administration (FHWA) in the Roadway Construction Noise Model (RCNM), in combination with the same FTA guidance for noise assessment used in the Project Noise and Vibration Analysis, the potential construction noise levels for each of the "under construction projects" was calculated. The construction noise levels from the Sycamore Hills Distribution Center are expected to range from 32.5 to 46.2 dBA L_{eq} at the Project noise sensitive receiver locations without accounting for any intervening building structures or topography. The cumulative construction noise levels from the Meridian South Campus are estimated at 24.8 to 34.8 dBA L_{eq}, and 30.2 to 42.5 dBA Leq from Meridian West Building 4. With the Project related construction noise levels ranging from 33.7 to 48.0 dBA L_{eq}, the cumulative construction noise levels are not expected to meaningfully contribute to a potential cumulative construction noise increase.



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

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

I-834.7 The comment includes a list of warehouses within a one-mile radius of the Project site. The APNs listed on Table 2 without a designation on Table 4-3, Cumulative Development Land Use Summary, of the Project Traffic Analysis, have been confirmed as currently existing. The APNs currently have building structures on these sites and traffic already being generated by these sites is accounted for in the baseline traffic counts that were conducted for the Project Traffic Analysis (Appendix N-2). Meridian West Building 4 is included as part of MJPA 1 because Building 4 is part of the Meridian West Campus development. The Cactus Avenue, Meridian Parkway, and Van Buren Boulevard projects could not be confirmed because the location is too generic to correlate with a site/project.

I-834.8 This comment includes tables listing warehouses and truck routes within the larger geographic scope of Western Riverside County and requests inclusion of all these warehouses in the cumulative analysis. In response to this comment, please see Response FL-G.4 and Topical Response 7 – Cumulative Projects for an explanation about the selection process for cumulative projects. The traffic generated by the existing development projects are already accounted for in the existing baseline traffic counts. Also, please see Topical Response 7 – Cumulative Projects for a discussion of the method of evaluation for each impact area. Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. Table 4.1 has been revised in the Final EIR. The method for cumulative evaluation for Greenhouse Gases is consistency with applicable statewide and local regulatory programs designed to reduce GHG emissions consistent with AB 32/SB 32 and consistency with SB 375. Under the Riverside County CAP, projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions) are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP. As such, projects that achieve a total of 100 points or more are considered to have a less than significant individual and cumulative impact on GHG emissions. MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables. The Project would not have cumulatively considerable GHG impacts. (Appendix C-4)

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From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Thursday, March 9, 2023 9:55 AM
To: Dan Fairbanks; Jennifer Larratt-Smith
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; Kevin Jefferies Riv Co Dist 1; Perry, Jim; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo; EEdwards@riversideca.gov; Plascencia, Gaby; Hemenway, Steve; ClCervantes@riversideca.gov; 2mayor@riversideca.gov; Ronaldo Fierro; Elizalde, Rafael; Jerry Shearer Jr.; Pete Elliott; Aaron Bushong; aesilva4@earthlink.net; Jing Sequoia
Subject: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: CommunityAlternatives.pdf

Dear Mr. Fairbanks, March JPC, Riverside City Council,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

Attached please find a comment on the community vision for acceptable alternative plans endorsed by RNOW, along with my own edits on why the proposed Project is inconsistent with the March JPA's own planning documents.

I-835.1

Our community has sent many other letters commenting (negatively) on the technical sections of the EIR, but we wanted to engage our elected officials in our positive vision for this land. I hope this sparks some dialogue and engagement on what a real shared vision of our future might look like.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-835.2 I-835.3 I-835.4

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months I have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the Project applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. As stated in my other letters, the Project as proposed by the Applicant is inconsistent with the thirty-year record of planning documents for the planned use of the West Campus parcel. It is inconsistent with the I-835.5 I-835.6

- 1996 Final Reuse Plan –
  - '*incorporate consensus of the adjacent communities, creation of a **Community Preference** land-use plan consistent with the goals of the community relative to base reuse, and to **maximize the opportunity for citizen involvement with base reuse***' (p. II-v).
  - See Exhibit B which clearly demonstrates that Industrial Development was not considered West of Brown St. on the Project Specific Plan area.
- 1999 General Plan –
  - Land Use Plan – The existing general land use plan does not consider Industrial Development for the Specific Plan of the West Campus Upper Plateau – this is upzoning to more intensive uses.
  - Specific Policies 2.3 and 2.4 – '*discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions' and 'Protect the interests of, and **existing commitments to adjacent residents, property owners,** and local jurisdictions in planning land uses*'.
- 2010 Draft General Plan (never adopted, but indicative of the thought process) –

- Section 2.2.25(d) – "*Any and all future distribution/warehouse development in the Meridian West area shall maintain a 1000' distance from existing residential uses in accordance with the Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities. (See 2.1.4 of the Land Use Element).*"
- Section 2.2.24: "*The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high paying jobs while protecting the environmental resources located therein.*
  - *b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space*
  - *d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high paying jobs (such as corporate offices), high technology jobs, and jobs related to the green building industry are preferred.*

- Appendix S – Centers for Biological Diversity Settlement Agreement 2012
  - In the Appendix S - CBD 2012 document, p.31/32 of the document contains a flyer about the Meridian campus co-published by LNR and March JPA. In it, the 7th bullet states, '*the MJPA enforces the WRCOG Good Neighbor Guidelines for the siting of warehouse and distribution use near residential communities.*'
  - The #1 Goal of the WRCOG GNG was to minimize diesel exposure to neighbors in close proximity to warehouses/distribution centers. The recommended strategy was to '*create a buffer zone of at least 300 meters (~1000 feet, can be office space, employee parking, greenbelt) between warehouse/distribution center and sensitive receptors*'.
- JPA Ordinances #17-06 and #21-02 on Truck Routes
  - *Whereas, the March JPA has determined that commercial truck travel by vehicles with gross weights over 5 tons can produce negative impacts on surrounding residential neighborhoods*.
  - *Whereas, this Ordinance seeks to implement objectives of the 'Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities' distributed and promoted by the Western Riverside Council of Governments…*

I-835.6 Cont.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to the Project for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

Alternate plan #1: The Campus Approach



I-835.7

- **Concept:** University of California Riverside (or other institutions of higher learning) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and

economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

- **Environmental Analysis:** No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
- **Project Objectives:** Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan)
- **Conclusion:** Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

Alternate plan #2: The Veterans Village Approach

I-835.7
Cont.



- **Concept**: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
- **Environmental Analysis:** No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
- **Project Objectives:** Support the heritage of March ARB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local

communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

- **Conclusion:** Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

Alternate plan #3: The State or County Park Approach



- **Concept:** A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
- **Environmental Analysis**: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
- **Project Objectives:** Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the March ARB. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
- **Conclusion:** Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans represent the community's consensus vision of alternative plans that would be suitable for consideration by the Project applicant and March JPA. In each of the alternatives, the Project would provide lower intensity uses with lower environmental impact. In alternatives 2 and 3, the jobs density provided would be higher than warehouse uses and less likely to be automated as technology advances. In all cases, the community preference that enhances our existing neighborhoods, blend in with the scale and focus of our area, and provide opportunities that enhance local and regional quality of life. I think these are of far higher economic value than the false promise of yet more low-

I-835.7 Cont.

paying warehouse jobs that provide little opportunity for economic advancement, home ownership, or the chance to achieve the American dream.

I hope that the March JPA and the Project Applicant seriously consider alternatives that reflect community preference. The community engagement to date has displayed a remarkable cynicism in this development of public land and it is a shame that the March JPA has not shown any leadership consistent with the Military Base with which it is affiliated. I hope this letter encapsulates the community's preferred vision for the land and allows the March JPA to reflect on its own mission within the context of the surrounding neighborhoods that it is supposed to be serving.

I-835.7 Cont.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

Letter I-835

Michael McCarthy
March 9, 2023

I-835.1 This comment is introductory and does not raise any specific issues on the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-835.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

I-835.3 This comment cites general concerns about the Draft EIR. However, the comment does not raise any specific issues on the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-835.4 This comment requests the evaluation of a non-industrial alternative. See Topical Response 8 – Alternatives, for a description and evaluation of new Alternative 5 – Non-Industrial Alternative.

I-835.5 This comment cites past requests from the community for the consideration of a non-industrial alternative. See Topical Response 8 – Alternatives, for a description and evaluation of new Alternative 5 – Non-Industrial Alternative.

I-835.6 This comment summarizes Comment Letter I-833. In response, please see Responses I-833.1 through I-833.15, above.

I-835.7 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Thursday, March 9, 2023 12:41 PM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: GoodNeighborGuidelines.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

Attached please find a comment on being a Good Neighbor. I hope the MJPA takes it to heart.

I-836.1

Please email me to confirm receipt of this public comment.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. I-836.2

Diesel Particulate Matter and other associated mobile source air toxics (benzene, 1,3-butadiene, formaldehyde, acetaldehyde, ethylbenzene, naphthalene, and polycyclic aromatic hydrocarbons [PAHs]) are responsible for upwards of 80% of ambient inhalation cancer risk in the South Coast Air Basin, according to the MATES V Figure ES-2[1]. This has been known for over two decades, and the CARB Air Quality and Land Use Handbook and the WRCOG Good Neighbor Guidelines, both released in 2005, indicate that the harms of warehouse siting were well established and understood at that time. I-836.3

For the past twelve months, I have attempted to engage with the March JPA about the appropriate siting of warehouses adjacent to communities. I have sent dozens of emails to the March JPA staff and City of Riverside clarifying and discussing warehouse siting guidelines. Throughout this process, it has been extremely discouraging to see how disingenuous the March JPA is in actually appropriately siting this project to protect human health. This letter is intended to provide a record of how the March JPA has failed in its obligations to minimize environmental impacts from its project planning process and has had no interest in providing alternatives to industrial land-use in a parcel that is not zoned for industrial land-use in the general plan. This lack of addressing a key public health threat is cynical and corrosive of public trust. The March JPA is well aware of community concerns and has refused to take concrete steps to reduce warehouse acreage, increase warehouse setbacks from adjacent residential zoning, or propose alternative land-uses with less detrimental effects. I-836.4

My comments reflect documents available publicly that discuss appropriate warehouse siting criteria, all of which have been included in documented correspondence over the past 12 months with the March JPA and Project Applicant and members of Riverside Neighbors Opposing Warehouses. These documents include:

- City of Riverside Good Neighbor Guidelines (GNG) – Adopted Nov. 2020[2] and associated Title 19 Development Standards

[1] http://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report-9-24-21.pdf?sfvrsn=6

[2] https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/2021/Good%20Neighbor%20Guidelines.pdf

- County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution Uses[3] – Adopted Nov.2019
- Western Riverside Council of Governments (WRCOG) – Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities[4] - Adopted Sept. 2005
- California Attorney General's Office - Warehouse Projects: Best Practices and Mitigation Measures to Comply with CEQA[5] - 2021
- City of Moreno Valley Good Neighbor Guidelines for warehouse distribution facilities[6]
- City of Perris Good Neighbor Guidelines – Adopted 2022[7]
- California Air Resources Board (CARB), Air Quality and Land Use Handbook: A Community Health Perspective (April 2005)[8].

I-836.4 Cont.

Notably, each of the member agencies that are a part of the March JPA have individually adopted Good Neighbor Guidelines for siting warehouses responsibly. These have been developed in response to community feedback asking for appropriate setbacks and development standards that take into account the harmful effects of heavy-duty trucks in close proximity to neighborhoods, parks, schools, and other so-called 'sensitive receptors' which is a fancy way of saying people. However, the March JPA has not established or adopted its own Good Neighbor Guidelines for warehouse siting, despite being comprised of four member agencies that have each adopted them.
However, the March JPA has:

1. included WRCOG 2005 GNG in its Ordinances #17-06 and #21-02 for Truck Routes – '*Whereas, this Ordinance seeks to implement objectives of the 'Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities' distributed and promoted by the Western Riverside Council of Governments…*
2. declared that the West Campus will follow WRCOG GNG in its March JPA Vision 2030 General Plan Update Section 2.2.25(d) – '*Any and all future distribution/warehouse development in the Meridian West area shall maintain a 1000' distance from existing residential uses in accordance with the Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities.*'[9]
3. In the Appendix S - CBD 2012 document, p.31/32 of the document contains a flyer about the Meridian campus co-published by LNR and March JPA. In it, the 7th bullet states, '*the MJPA enforces the WRCOG Good Neighbor Guidelines for the siting of warehouse and distribution use near residential communities.*'

I-836.5

Given the wide range of GNG mentions in the March JPA planning documents, it was surprising for me to learn that the March JPA does not actually have any GNG, at least with regards to planning the Project for the West Campus Upper Plateau. On June 1, 2022, I received the following email from Mr. Dan Fairbanks, Planning Director of the March JPA.

'Mike,

[3] https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf

[4] https://wrcog.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId=

[5] https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

[6] https://library.qcode.us/lib/moreno_valley_ca/pub/municipal_code/item/title_9-chapter_9_05-9_05_050

[7] https://www.cityofperris.org/home/showpublisheddocument/15478/637999606610400000

[8] https://files.ceqanet.opr.ca.gov/221458-6/attachment/UNr-g159CW-r0G4DR8q6daNdAKT3RJTd8gGQCfz4wqFfl-eNdZNQEqjf8tfls1x6Gsae7YqpXwtFIZBd0

[9] Draft General Plan 2010 was never adopted by the March JPA but is available on CEQANET SCH 2010051054

We have not adopted a Good Neighbor policy for siting warehouses. However, we would analyze the proposal against the County and WRCOG guidelines.

Dan Fairbanks - Planning Director'

I-836.5 Cont.

I then began asking my City Council to advocate for residents in the project, given that most of the warehouses are within 800 feet of City of Riverside Residents homes. As the City of Riverside is an adjacent jurisdiction, and a member agency, I presumed that the March JPA would respect and respond to City of Riverside GNG which specifically preclude warehouses larger than 100,000 square feet from being built within 800 feet of residential zoning.

Dr. Grace Martin, Executive Director of the March JPA, gave a presentation at the Riverside City Council meeting on September 6th, 2022. Her presentation included a statement at 3:44:03 that, "for the City of Riverside's Municipal Code 19.435.030, the Warehousing and Distribution Facilities Guidance - we have a checklist that whatever criteria was in the City's Code, this Project was meeting it or exceeding it."[10]

Similarly, Adam Collier, the Project Applicant's primary point-of-contact with the community, gave a presentation at the August, 2022 and February 2023 community information meetings that described the project's conformity. In the February 2023 meeting, he exclaimed that the project was meeting all City of Riverside criteria.

I find these assertions misleading and/or false. City of Riverside GNG include Title 19 Development standards and a set of goals for minimizing diesel PM and other traffic pollutant exposure. The West Campus Upper Plateau is maximizing the amount of developable space available for warehouses in this project and putting it within a few hundreds of feet of homes, a park, and a church. Every single parcel of developable land is zoned for warehouse use, with the minor exception of 2 acres of public facilities for a sewer lift and electrical substation necessary to support the project. **Figure 1** shows the proposed project and 800' buffers around each warehouse polygon, based on the City of Riverside GNG setback requirements for warehouses up to 100,000 sq.ft.

I-836.6

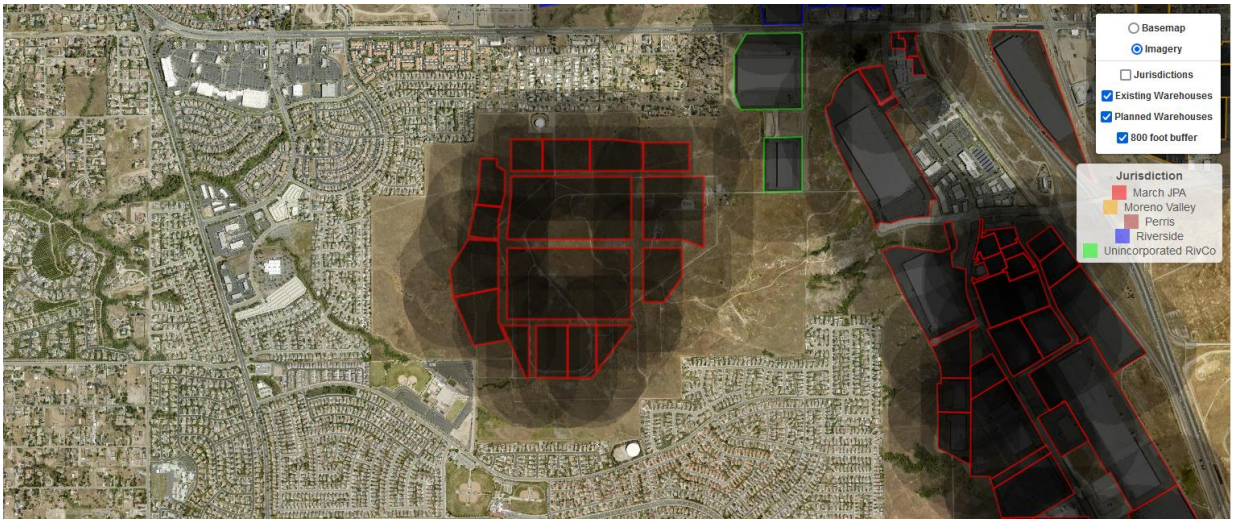


Figure 1 – Proposed project buildings and 800' buffers indicating City of Riverside GNG for buildings up to 100,000 sq.ft.

[10] https://riversideca.granicus.com/player/clip/5220?view_id=2&meta_id=357122&redirect=true&h=04482c77561292e13c3f715f60e034a6

Discrepancies with City of Riverside GNG

Specifically, I make note of the following conflicts between the City of Riverside GNG and the Project.

1) Mixed-use zones in the Specific Plan[11] allow warehouses in the 'business park enterprise' setting. This would not be allowed based on City of Riverside Title 19 standards and isn't allowed in the current March JPA general plan or in any other specific plan area of the March JPA.
2) The Mixed-use parcels in the southwest corner of the Project are clearly within 800' feet of the Grove Church and are 9.12 and 7.84 acres, respectively. The Grove Church is in a residential zone. At a FAR of 0.35 – the warehouses in these parcels do not currently conform to the 100,000 square feet limit for City of Riverside Title 19 standards and thus do not appear to guarantee City Guidelines would be implemented based on current parcel sizes.
3) Building heights in the industrial zone have a max height of 50 feet as shown in the Specific Plan and building plot plans[12]. City of Riverside standards are 45 feet max height. This does not meet or exceed City guidelines, especially given that the Industrial Zone buildings are on a hill 50 to 75 feet higher than surrounding homes in Mission Grove and Camino Del Sol. This may also fall afoul of the GNG neighborhood character goal 1 related to heights and setbacks, for industrial uses to 'minimize visual impacts'. Similarly, the warehouse complex screens industrial mega-warehouses using smaller warehouses as screens. That seems ineffective at minimizing visual impacts.
4) The health risk assessment in Appendix C2 did not include the proposed park as a sensitive receptor location in its analysis. The Park will be used for active recreation less than 100 feet from warehouses. The park is extremely likely to be used for preschool children and active recreation that will enhance breathing rates leading to higher exposures for these children. Riverside GNG clearly state that a health risk assessment should be performed and diesel exposures to sensitive receptors (schools, **parks, playgrounds**, etc.) should be **minimized**. This park is likely to receive higher doses of diesel PM and NOx due to its closer proximity to the proposed warehouses yet is not included in the health risk assessment at all as a sensitive receptor location (see appendix C2 Exhibit 2-D).
5) The construction phase noise mitigation does not seem to be consistent with city GNG to 'minimize' noise, allows blasting, and allows noises starting at 6 AM until 10 PM, rather than the city 7-7 guidelines.

Given these clear discrepancies, I ask that the March JPA and the Project Applicant go through the City of Riverside GNG once again with a checklist that includes these itemized bullets and revise the plans to fully meet or exceed all City of Riverside GNG to be in compliance with a project that could be built within the City of Riverside, as promised by Dr. Martin.

I-836.7

Additionally, the City of Riverside Land Use and Planning Committee is considering a matrix of policy options to strengthen City GNG. These are being discussed on March 13th, 2023 but the full details of the policy options are included in Agenda item #3[13], including a report, revised matrix of policy actions, and a presentation. The two High committee priority items are:

- Amend Development Standards/GNG 2020 to include protections for additional Sensitive Receptors, revise building size, FAR and other development limits
- Revised outreach and notice procedures (timing, method, community meetings, etc.).

I-836.8

RNOW members and other concerned community stakeholders such as Friends of Riverside Hills, Riverside Neighbors Better Together, and CCAEJ are requesting cumulative development standards and building size standards that would block the development of Projects like the West Campus Upper Plateau. We are asking for buildings over 500,000 square feet to be prohibited within 1,500 feet of homes and for the cumulative square footage of warehouse buildings to not exceed 2X the individual maximum building size limit. The impacts to the

[11] https://marchjpa.com/wp-content/uploads/2023/01/West-Campus-Upper-Plateau-Specific-Plan-5th-Screencheck-Clean-2023-01-10.pdf

[12] https://marchjpa.com/wp-content/uploads/2023/01/Plot-Plan-Building-B.pdf

[13] https://riversideca.legistar.com/LegislationDetail.aspx?ID=6046856&GUID=E6904957-9600-46F2-85EE-DA91BC896E4F&Options=&Search=

West Campus Upper Plateau project would limit the total square footage to approximately 1.2M square feet of warehouses, with no more than two 100,000 square foot warehouses within 800 feet and no more than two 500,000 square foot warehouses within 1,500 feet of homes. The mega-warehouses in this project would have to be scaled down and could not be surrounded 16 other warehouses. We think that is a more reasonable standard to apply.

I ask that the March JPA and the Project Applicant observe the March 13th, 2023 City Land Use Planning Committee meeting and agree to meet or exceed the potential future City of Riverside Good Neighbor Guidelines when considering the Project. I think it is important to be a good neighbor and would hope the March JPA would finally agree with that sentiment instead of continuing to push forward bad neighbor development that ignores community feedback.

I-836.8 Cont.

Discrepancies with WRCOG GNG (as adopted in JPA #21-02 and #17-06 Truck Route Ordinances)

The primary goal of the JPA's truck route ordinance was to establish truck routes that avoided residential streets in neighborhoods, designate truck routes, establish signage for truck routes, and allow vehicles to be weighed. However, it is not stated that the adopted truck route ordinance is intended to only implement the objectives for truck routing and signage while ignoring the effects of warehouse siting.

The #1 Goal of the WRCOG GNG was to minimize diesel exposure to neighbors in close proximity to warehouses/distribution centers. The recommended strategy was to '*create a buffer zone of at least 300 meters (~1000 feet, can be office space, employee parking, greenbelt) between warehouse/distribution center and sensitive receptors*'.

Additional goals of the WRCOG GNG that apply include
#5 Establish a diesel minimization plan to be implemented with new projects (not provided in the DEIR), and
#7 Establish a public outreach program and conduct periodic community meetings to address issues from neighbors (not provided in the DEIR or by the March JPA).

I-836.9

Furthermore, it does not appear that there are any analyses within the project that meet Mr. Fairbanks, June 1, 2022 assertion that the project would be analyzed with respect to the WRCOG GNG. As such, it is not clear that the March JPA's correspondence on the project goals was true when discussing the project objective with residents or the Riverside City Council.

I ask that the March JPA include formal and clearly responsive plans and comments within the draft EIR to bring the project into full compliance with WRCOG GNG and require all warehouses to have 1,000 foot setbacks from residential zoning. Subdividing parcels with smaller buildings does not reduce the acreage of warehouses, their proximity to residential homes, nor the traffic footprint and the residential exposure to these toxic air contaminants. Real mitigation is required and that either requires substantial (50+%) battery-electrification fleet requirements for all tenants or a land-use that does not involve heavy-duty trucks.

Discrepancies with County of Riverside GNG

The County of Riverside Guidelines are also extremely relevant, as the 14th Amendment to the March JPA has been approved by the Cities of Riverside, Perris, and Moreno Valley and is likely to be approved by the County of Riverside in April 2023. In it, the March JPA land-use authority and municipal enforcement authority will be returned to the County on July 1, 2025. As a result, the County of Riverside will oversee at least 60% and more likely 80+% of the construction phase and 100% of the operational phase of the Project through 2041.

It therefore makes a lot of sense to ensure that March JPA policies are consistent with the land-use and enforcement authority that will oversee the Project's lifecycle. Moreover, the March JPA promised to analyze the impacts of the project relative to County Good Neighbor Policy.

- Policy 1.4 - A "Construction Traffic Control Plan" shall be prepared prior to grading, which details the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations. This is in addition to a Traffic Impact Study as may be required for the environmental review process. Mitigation Measure MM TRA-1 requires a March JPA approved traffic management plan, but there is no indication it would be approved by the County.
- Policy 2.3 - The maximum daily disturbance area (actively graded area) shall not exceed 10 acres per day. March JPA allows 20 acres per day. Please conform with County guidelines.
- Policy 2.9 - Construction Contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations. I do not see any construction anti-idling measures in the draft EIR.
- Policy 2.10 - During construction, the Transportation & Land Management Agency representative shall conduct an on-site inspection with a facility representative to verify compliance with these policies, and to identify other opportunities to reduce construction impacts. I do not see any enforcement of this policy in the draft EIR.
- Policy 3.1 - Warehouse/distribution facilities should be generally designed so that truck bays and loading docks are a minimum of 300 feet, measured from the property line of the sensitive receptor to the nearest dock door using a direct straight-line method. This distance may be reduced if the site design include berms or other similar features to appropriately shield and buffer the sensitive receptors from the active truck operations areas. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design. The proposed Park is a 'sensitive receptor' within 300' feet of truck bays and loading docks.
- Policy 3.8 - An additional "wing-wall" shall be installed perpendicular to the loading dock areas to further attenuate noise related to truck activities and also address aesthetics by screening the loading area when adjacent to sensitive receptors. This does not appear to be considered for the mixed-use or business park warehouses closest to residential zoning and parks.
- Policy 4.1 Facility operators shall maintain records of their facility owned and operated fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks ("MHDT") and Heavy-Heavy Duty ("HHD") trucks with a gross vehicle weight rating greater than 19,500 pounds accessing the site use year CARB compliant 2010 or newer engines. The records should be maintained on-site and be made available for inspection by the County. Not mentioned in the draft EIR.

I-836.10

- Policy 4.6 - Facility operators shall establish specific truck routes between the facility and regular destinations, identifying the most direct routes to the nearest highway/freeway and avoid traveling near sensitive receptors. Not mentioned in the draft EIR.
- Policy 5.5 - Each Facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information should be provided to the County and updated annually, and signs should be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community. These signs shall also identify the website and contact information for the South Coast Air Quality Management District. Not mentioned in the draft EIR.
- Policy 6.3 - Applicants for proposed new facilities should look beyond their immediate development footprint and look for opportunities to enhance the surrounding community through upgrades such as street paving, walls, landscaping, or other types of infrastructure improvements… I would like these to be discussed in the draft EIR because this is what I have been asking for the last 12 months.
    - Project design features that **directly offset NOx reductions** above and beyond what is required by existing air quality regulations
    - Provision of **additional buffers between the new facility and sensitive receptors**, in addition to those setbacks required pursuant to Section 3.1 herein; and
- Policy 6.4 - Given the potential for community impacts related to the construction and operation of logistics and warehouse facilities, the applicant for any new facility may be required to provide a supplemental funding contribution, which would be applied to further off-set potential air quality impacts to the community and provide a community benefit above and beyond any CEQA related mitigation measures. Said financial contribution would generally be determined by the Transportation and Land Management Agency based on the level of nitrogen oxides (NOx) emissions generated by the project that exceeds the regional NOx significance thresholds established by the appropriate AQMD. Said supplemental funding contribution will be collected on a one-time basis. Funds collected under said supplemental funding program will be subject to designation for use by the Board of Supervisors, and will generally be used for projects that directly benefit the impacted community wherein the project is located. The types of projects that the Board of Supervisors may designate for use of these funds include, but are not limited to: I would like these to be discussed in the draft EIR because this is what I have been asking for the last 12 months.
    - Project design features that **directly offset NOx reductions** above and beyond what is required by existing air quality regulations
    - Provision of **additional buffers between the new facility and sensitive receptors**, in addition to those setbacks required pursuant to Section 3.1 herein; and

I-836.10 Cont.

Summary

There is a well established and well-understood planning guidance to avoid land-use planning conflicts. The March JPA and the project Applicant have chosen to ignore all those documents and instead are introducing a land-use conflict that harms public health. The March JPA has chosen to ignore its own planning documents, truck route Ordinances, and past pledges to the community by proposing an industrial project between three neighborhoods. Surrounding homes on three sides by warehouses and

I-836.11

warehouses on three sides by homes is just bad planning. The March JPA knows better, and so does the Lewis Group. Their callous disregard for the people living in the neighborhoods surrounding this project is a clear example of the failure of this agency to live up to its mission to serve the public and provide for the greater good.

Good Neighbor Guidelines and Policies are relatively simple ideas – don't put intense industrial land-uses next to people. The March JPA can easily identify non-warehouse uses for this land that will meet project objectives with less environmental impact. Tax revenue and developer greed should not be an overriding consideration for harming residents.

I-836.11
Cont.

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

R-NOW

Letter I-836

Michael McCarthy
March 9, 2023

I-836.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-836.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

I-836.3 This comment references health risks associated with DPM and the CARB Air Quality and Land Use Handbook and the WRCOG Good Neighbor Guidelines. The comment does not raise any specific issues on the adequacy of the environmental analysis in the Draft EIR. No further response is required.

I-836.4 This comment questions community engagement. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the project site resulting in 2,172 public notices. With regard to the request for a non-industrial alternative, please see Topical Response 8 – Alternatives, which includes a no-warehouse alternative. The comment summarizes the documents reviewed by the commenter.

I-836.5 This comment suggests March JPA has informally adopted the WRCOG Good Neighbor Guidelines. JPA Ordinance #21-02, Truck Routes, references the WRCOG Good Neighbor Guidelines in a recital. That reference does not constitute adoption of the WRCOG Good Neighbor Guidelines. JPA Ordinance #21-02 does implement Goal 2 of the WRCOG Guidelines: Eliminate diesel trucks from unnecessarily traversing through residential neighborhoods. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue.

The comment also requests that the 1000-foot distance between warehouses and residences be incorporated into the Project. Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. Industrial buildings must be set back a minimum of 1,000 feet from residential. In addition, any industrial-use building will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks.

As detailed in Recirculated Section 4.10, Land Use and Planning, the Project is consistent with the Good Neighbor Guidelines for the County of Riverside. The Project's consistency with the City of Riverside Good Neighbor Guidelines is discussed in Topical Response 4 – Project Consistency. The purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project

is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses.

I-836.6 This comment questions the Project's consistency with the City of Riverside Good Neighbor Guidelines. The Project's consistency with the City of Riverside Good Neighbor Guidelines is discussed in Topical Response 4 – Project Consistency. In response, please see Response I-836.5, above.

I-836.7 This comment generally questions the Project consistency with the City of Riverside's Good Neighbor Guidelines. Please see Topical Response 4 – Project Consistency for analysis of the Project's consistency with the City of Riverside's Good Neighbor Guidelines.

1. This comment questions the inclusion of business enterprise as a permitted use within mixed use zones and notes similar uses are not allowed in the City of Riverside or the March JPA General Plan. Under the March JPA General Plan definition of Mixed Use, "major warehousing uses are excluded." The Business Enterprise designation is intended to provide a transitional environment that allows for limited commercial and office uses in conjunction with small scale industrial warehouse activity. It is understood that this activity may differ from what the City of Riverside currently allows in a mixed-use environment. However, the allowance of business enterprise within the Specific Plan Mixed Use land use is appropriate for this location and the overall development of the site and surrounding uses.

2. This comment questions the allowable square footage on the Mixed Use parcels closest to the Grove Community Church. The Grove Community Church is approximately 794 feet away from the Project's Mixed Use parcels (See Figure 4.2-1b of the Final EIR). Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential.

3. This comment claims the Project does not comply with the City of Riverside Good Neighbor Guidelines because the maximum building height allowed on Industrial parcels is 50 feet and the City standards are limited to 45 feet. The cited City standard is not part of the City's Good Neighbor Guidelines. Please see Topical Response 4 – Project Consistency for analysis of the Project's consistency with the City of Riverside's Good Neighbor Guidelines.

4. This comment requests the Project HRA include the proposed park as a sensitive receptor. The analysis has been revised to include the proposed Park as a sensitive receptor during operation of the proposed Project. As detailed in the Project HRA and Final EIR, the results of the analysis indicate that a less than significant impact would occur for users (including children) of the Park as a result of Project operational emissions. The risk to the Park users would be 1.18 in one million without mitigation and 0.62 with mitigation, both of which are less than the applicable SCAQMD threshold of 10 in one million. Additionally, at this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. The Project HRA contains the model runs and risk calculations.

5. This comment questions the Project's noise impacts and states the Project allows noises starting at 6AM until 10PM, rather than the City's 7-7 guidelines. As discussed in Section 4.11, Noise, the Project will have less than significant construction noise impacts and no mitigation

is required. PDF-NOI-1 has been revised in the Final EIR to reflect construction hours between 7AM and 7PM. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-836.8 This comment requests March JPA consider draft policy options being considered for the City of Riverside's Good Neighbor Guidelines. These options are still drafts and not adopted.

I-836.9 This comment asserts March JPA has adopted the WRCOG Good Neighbor Guidelines through JPA Ordinance #21-02. JPA Ordinance #21-02 references the WRCOG Good Neighbor Guidelines in a recital. That reference does not constitute adoption of the WRCOG Good Neighbor Guidelines. JPA Ordinance #21-02 does implement Goal 2 of the WRCOG Guidelines: Eliminate diesel trucks from unnecessarily traversing through residential neighborhoods. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. March JPA has not adopted a Good Neighbor Guidelines policy. Please see Topical Response 4 – Project Consistency for a discussion of the Project's consistency with the WRCOG Good Neighbor Guidelines.

I-836.10 This comment questions the Project's consistency with the County of Riverside's Good Neighbor Guidelines. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the Project's consistency with the County of Riverside Good Neighbor Guidelines. With regard to the County's involvement with the Project, please see Topical Response 9 – Long-Term Project Implementation and Enforcement.

I-836.11 This comment expresses opposition to the proposed Project and summarizes the comments made within Comment Letter I-836, which are responded to above.

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From: Michele Muehls <michelebello@hotmail.com>
Sent: Thursday, March 9, 2023 6:52 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Michele Muehls

Letter I-837

Michele Muehls
March 9, 2023

I-837.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: MJ Rivera <milo.rivera21052@gmail.com>
Sent: Thursday, March 9, 2023 4:15 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties in this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with a business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. The project meets JPA objectives 1-3, 5-7; the project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitats. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

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· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. The project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the goodwill of the community and connect to the history and present-day operations of March ARB.

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· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Milo Rivera
922 Kilmarnock Way
Riverside, CA. 92508
milo.rivera21052@gmail.com

Letter I-838

Milo Rivera
March 9, 2023

I-838.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: MJ Rivera <milo.rivera21052@gmail.com>
Sent: Thursday, March 9, 2023 4:17 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munition's bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Milo Rivera
922 Kilmarnock Way
Riverside, CA. 92508
milo.rivera21052@gmail.com

Letter I-839

Milo Rivera
March 9, 2023

I-839.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: MJ Rivera <milo.rivera21052@gmail.com>
Sent: Thursday, March 9, 2023 4:19 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer proposes an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning to be your lasting legacy. I await your detailed response.

Sincerely,

Milo Rivera
922 Kilmarnock Way
Riverside, CA. 92508
milo.rivera21052@gmail.com

Letter I-840

Milo Rivera
March 9, 2023

I-840.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: matt silveous <mattsilveous1812@gmail.com>
Sent: Thursday, March 9, 2023 7:07 AM
To: Dan Fairbanks
Cc: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

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· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach
· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Matt Silveous
20815 indigo point 92508, Riverside

Letter I-841

Matt Silveous
March 9, 2023

I-841.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Michelle Singleton <michellesingleton.adem67@gmail.com>
Sent: Thursday, March 9, 2023 7:41 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

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· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

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· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Michelle Singleton30492 Shenandoah Court, Menifee, CA 92584
michellesingleton.adem67@gmail.com

Letter I-842

Michelle Singleton
March 9, 2023

I-842.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Melissa Suarez <melissaims@yahoo.com>
Sent: Thursday, March 9, 2023 7:38 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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Thank you for allowing me to provide comments on this project.

Sincerely,
Melissa Suarez

Letter I-843

Melissa Suarez
March 9, 2023

I-843.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Mary Viafora <mlviafora@gmail.com>
Sent: Thursday, March 9, 2023 11:39 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

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Thank you for allowing me to provide comments on this project.

Sincerely,
Mary Viafora

Letter I-844

Mary Viafora
March 9, 2023

I-844.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Nicole Bernas <onecosmiclove@icloud.com>
Sent: Thursday, March 9, 2023 3:34 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for the opportunity to provide comments on this project.

Sincerely,

Nicole Bernas
19981 St Francis Dr
Riverside, CA 92508

Letter I-845

Nicole Bernas
March 9, 2023

I-845.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Nicolette Rohr <nicolette.rohr@gmail.com>
Sent: Thursday, March 9, 2023 8:46 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project. As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

The draft EIR does not properly analyze the project's impact on air quality, traffic, health risks, geology, soil, greenhouse gas emissions, and housing. It also fails to consider non-industrial alternatives.

Residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have been clear: no more warehouses. Warehouses degrade our quality of life and the health of our community without any clear benefit.

Meanwhile, the JPA and the applicant have shown no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area. Riverside Neighbors Opposing Warehouses (RNOW) has developed three reasonable alternatives to plans for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

I urge you to consider these alternatives.

Sincerely,

Nicolette Rohr
nicolette.rohr@gmail.com
Riverside (92506)

Letter I-846

Nicolette Rohr
March 9, 2023

I-846.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Thursday, March 9, 2023 8:25 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Pete Pettis

Letter I-847

Pete Pettis
March 9, 2023

I-847.1 This comment is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Rick Lloyd <r.lloyd@gte.net>
Sent: Thursday, March 9, 2023 7:16 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement. A solar facility with battery storage would help the city of Riverside meet it's sustainability goals. I-848.2

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. I-848.3

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
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I-848.3 Cont.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Rick Lloyd
8625 Orchard Park Dr
Riverside, Ca 92508
r.lloyd@gte.net

Letter I-848

Rick Lloyd
March 9, 2023

I-848.1 This comment is Form Letter H – Alternatives. As such, in response to this comment, please see Topical Response 8 – Alternatives.

I-848.2 This comment requests the consideration of a solar facility with battery storage. Because of the Project site's proximity to an active airfield, solar projects require additional review by the Riverside County Airport Land Use Commission and March Air Reserve Base to ensure glint and glare do not interfere with flight operations. As shown in Table 3-2, Land Uses by Land Use Designation, of Recirculated Chapter 3, Project Description, energy generation and distribution facilities are not allowed in the Specific Plan Area. MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. MM-AES-3 requires the design of solar photovoltaic systems to be reviewed by ALUC and March ARB through a glint and glare study.

I-848.3 This comment is Form Letter H – Alternatives. As such, in response to this comment, please see Topical Response 8 – Alternatives.

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From: raquel.ortiz09 <raquel.ortiz09@yahoo.com>
Sent: Thursday, March 9, 2023 8:21 PM
To: Dan Fairbanks
Cc: Ortiz, Raquel
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? I-849.1

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

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

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

underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. I-849.1 Cont.

We have to drive every day to pick up and drop off the children from home to school. There are days that we have to do it multiple times. Currently, the fast road is thru Meridian. It will be crowded and packed of traffic if more warehouses are built in this area. I-849.2

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you! I-849.3

Sincerely,
Raquel Ortiz
Zip Code 92553
raquel.ortiz09@yahoo.com

Sent from my T-Mobile 4G LTE Device

Letter I-849

Raquel Ortiz
March 9, 2023

I-849.1 This comment is the same as Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-849.2 This comment raises concerns regarding increased congestion on Meridian Parkway. Meridian Parkway is a March JPA truck route. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. This comment does not raise any specific issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

I-849.3 This comment requests that the traffic study be redone. As discussed in Form Letter G Response, no updates to the traffic study are necessary.

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From: Ronald Peters <rjpeters13@yahoo.com>
Sent: Thursday, March 9, 2023 12:47 PM
To: Dan Fairbanks
Cc: Jen L.; rnowgroup@gmail.com; Michael McCarthy
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have. Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16? Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate. Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region. If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers. It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project. Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates. Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally. Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023. Sincerely,

Ronald Peters
7762 Northrop Dr. Riverside, Ca 92508

Letter I-850

Ronald Peters
March 9, 2023

I-850.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Ronald Peters <rjpeters13@yahoo.com>
Sent: Thursday, March 9, 2023 12:48 PM
To: Dan Fairbanks
Cc: rnowgroup@gmail.com; Jen L.; Michael McCarthy
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you! Sincerely,

Ronald Peters
7762 Northrop Dr., Riverside, Ca 92508

Letter I-851

Ronald Peters
March 9, 2023

I-851.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Ronald Peters <rjpeters13@yahoo.com>
Sent: Thursday, March 9, 2023 12:48 PM
To: Dan Fairbanks
Cc: rnowgroup@gmail.com; Jen L.; Michael McCarthy
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers. Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you! Sincerely,

Ronald Peters
7762 Northrop Dr., Riverside, Ca 92508

Letter I-852

Ronald Peters
March 9, 2023

I-852.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Ronald Peters <rjpeters13@yahoo.com>
Sent: Thursday, March 9, 2023 12:49 PM
To: Dan Fairbanks
Cc: rnowgroup@gmail.com; Jen L.; Michael McCarthy
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies? In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan? As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated, "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein. b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred. Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community

members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process. Thank you for letting me comment on your project. Sincerely,
Ronald Peters
7762 Northrop Dr., Riverside, Ca 92508

Letter I-853

Ronald Peters
March 9, 2023

I-853.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Ronald Peters <rjpeters13@yahoo.com>
Sent: Thursday, March 9, 2023 12:50 PM
To: Dan Fairbanks
Cc: rnowgroup@gmail.com; Jen L.; Michael McCarthy
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area. Specifically, I would like to ask: 1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section? 2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project? 3. Why were PFAS and perchlorate omitted in soil testing? 4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis? 5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area. Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers. In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm. The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance. As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed Thank you for allowing me to provide comments on this project. Sincerely,
Ronald Peters
7762 Northrop Dr., Riverside, Ca 92508

Letter I-854

Ronald Peters
March 9, 2023

I-854.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Ronald Peters <rjpeters13@yahoo.com>
Sent: Thursday, March 9, 2023 12:50 PM
To: Dan Fairbanks
Cc: rnowgroup@gmail.com; Jen L.; Michael McCarthy
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can. Wildlife: 1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB. 2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old. Plant life: 1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life? 2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted. I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced? Thank you for allowing me to provide comments on this project. Sincerely,
Ronald Peters
7762 Northrop Dr., Riverside, Ca 92508

Letter I-855

Ronald Peters
March 9, 2023

I-855.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Ronald Peters <rjpeters13@yahoo.com>
Sent: Thursday, March 9, 2023 12:51 PM
To: Dan Fairbanks
Cc: Michael McCarthy; Jen L.; rnowgroup@gmail.com
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents. The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response. Sincerely,

Ronald Peters
7762 Northrop Dr., Riverside, Ca 92508

Letter I-856

Ronald Peters
March 9, 2023

I-856.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Rita Schneider <rita.m.schneider@gmail.com>
Sent: Thursday, March 9, 2023 8:40 PM
To: Dan Fairbanks
Cc: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
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· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

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· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
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· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
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· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
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· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

I love living in Orangecrest and attending the Grove, but the abundance of warehouses being built is making the neighborhood less and less desirable. Please consider other options for this land that will better serve the community for years to come!

Thank you for allowing me to provide comments on this project.

Sincerely,
Rita Schneider
8536 Chesterfield Rd, Riverside 92508
Rita.m.schneider@gmail.com

Letter I-857

Rita Schneider
March 9, 2023

I-857.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Rita Schneider <rita.m.schneider@gmail.com>
Sent: Thursday, March 9, 2023 8:53 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-858.1

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

I-858.1 Cont.

Because I live in Orangecrest and attend the Grove, I frequently drive the surrounding roads. It makes my heart sink when ugly warehouse after ugly warehouse replaces what used to be vistas of inspiring beauty. The community doesn't want these monstrosities to be such an overbearing part of our everyday lives.

I-858.2

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

I-858.3

Sincerely,

Rita Schneider
8536 Chesterfield Rd, Riverside 92508
Rita.m.schneider@gmail.com

Letter I-858

Rita Schneider
March 9, 2023

I-858.1 This comment is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-858.2 This comment notes loss of vistas because of warehouses. The comment does not raise any issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-858.3 This comment is the same concluding paragraph of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Rita Schneider <rita.m.schneider@gmail.com>
Sent: Thursday, March 9, 2023 8:59 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. I-859.1

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment. As a parent of 3 young children who love to play outside, both at our home in Orangecrest and at our church, The Grove, the air quality is an issue that is very important to me.

I-859.1 Cont.

I-859.2

Sincerely,

Rita Schneider
8536 Chesterfield Rd, Riverside 92508
Rita.m.schneider@gmail.com

Letter I-859

Rita Schneider
March 9, 2023

I-859.1 This comment is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-859.2 This comment expresses concern about air quality. Recirculated Section 4.2, Air Quality, and Appendix C-2R assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts identified in the Draft EIR.

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From: Sara Amend <jnsamend@gmail.com>
Sent: Thursday, March 9, 2023 2:18 PM
To: Dan Fairbanks
Cc: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
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2. Alternate plan #2: The Veterans Village Approach
· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Sara Amend
19220 Stagecoach LN Riverside 92508
jnsamend@gmail.com

Letter I-860

Sara Amend
March 9, 2023

I-860.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Susana Balmer <balmer.susana@gmail.com>
Sent: Thursday, March 9, 2023 4:25 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Susana Balmer
20699 Hillsdale Rd.
92508 Riverside CA

Letter I-861

Susana Balmer
March 9, 2023

I-861.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Sue Nipper <markel221@gmail.com>
Sent: Thursday, March 9, 2023 7:42 AM
To: Dan Fairbanks
Cc: Conder, Chuck; Cindy Camargo; district1@rivco.org; district5@rivco.org; edd@moval.org; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. **I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.**

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach
· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Every one of these alternatives is vehemently preferred over the current unacceptable plan. Please consider one of these for the future of the families in Orangecrest.

Thank you for allowing us to provide comments on this project.

Sincerely,

Ken and Susan Nipper
19367 Mt Wasatch Dr
Riverside, CA 92508

Letter I-862

Ken and Susan Nipper
March 9, 2023

I-862.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: KELLEY PAGE <kpage68684@verizon.net>
Sent: Thursday, March 9, 2023 8:24 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Suzanne Page

Letter I-863

Suzanne Page
March 9, 2023

I-863.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:20 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Sally Quintana
8541 Rosemary Dr
Quintanasb@yahoo.com

Sent from my iPhone

Letter I-864

Sally Quintana
March 9, 2023

I-864.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:22 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Sally Quintana
8541 Rosemary Dr
Riverside, CA 92508
Quintanasb@yahoo.com

Sent from my iPhone

Letter I-865

Sally Quintana
March 9, 2023

I-865.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:26 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.riversideca.gov%2fcedd%2feconomic-development%2fdata-reports%2fdata-dashboard&c=E,1,l9w08I0I_WczEokarI18uNY-oKeMQvSXjpaW-14iiq26_Gq3kY1m8RximKZx4FqibajpoR_x7-Q94Pdu4KnSQJtTbffTTzC50iapnFess9s,&typo=1), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.moval.org%2fcdd%2fpdfs%2fprojects%2fwlc%2fwcl-

deir0213.pdf%2c&c=E,1,ARxyX0F2VkBIDlwrtJg7jKMja1JREaZXF-slbTj2MSB4sNemXSozLPr-RpT8npnSWYocW9KXoqcZrz8wyoLq2kQIrOV_rGxE2dK25-tuvb9NgA,,&typo=1 p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Sally Quintana
8541 Rosemary Dr
Riverside, CA 92508
Quintanasb@yahoo.com

Sent from my iPhone

Letter I-866

Sally Quintana
March 9, 2023

I-866.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:29 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,

Sally Quintana
8541 Rosemary Dr
Riverside, CA 92508
Quintanasb@yahoo.Com

Sent from my iPhone

Letter I-867

Sally Quintana
March 9, 2023

I-867.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:31 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Sally Quintana
8541 Rosemary Dr
Riverside, CA 92508
Quintanasb@yahoo.com

Sent from my iPhone

Letter I-868

Sally Quintana
March 9, 2023

I-868.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:34 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Sally Quintana
8541 Rosemary Dr
Riverside, CA 92508
Quintanasb@yahoo.com

Sent from my iPhone

Letter I-869

Sally Quintana
March 9, 2023

I-869.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:36 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Sally Quintana

8541 Rosemary Dr
Riverside, CA 92508
Quintanasb@yahoo.com

Sent from my iPhone

Letter I-870

Sally Quintana
March 9, 2023

I-870.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Sally Quintana <quintanasb@yahoo.com>
Sent: Thursday, March 9, 2023 9:41 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Sally Quintana
8541 Rosemary Dr
Riverside, CA 92508
Quintanasb@yahoo.com

Sent from my iPhone

Letter I-871

Sally Quintana
March 9, 2023

I-871.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Tia Ballesteros <tiaballesteros13@gmail.com>
Sent: Thursday, March 9, 2023 7:42 AM
To: Dan Fairbanks
Cc: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
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· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach
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· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.
Sincerely,

Tia Ballesteros
941 Saltcoats Drive
Riverside, CA 92508
Tiaballestero13@gmail.com

Letter I-872

Tia Ballestros
March 9, 2023

I-872.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: CHRISTINE MARTIN <timnchrismartin@aol.com>
Sent: Thursday, March 9, 2023 2:20 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,

Tim Martin

Letter I-873

Tim Martin
March 9, 2023

I-873.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: CHRISTINE MARTIN <timnchrismartin@aol.com>
Sent: Thursday, March 9, 2023 2:22 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Tim Martin
timnchrismartin@aol.com
5933 Shaker Dr.
Riverside, CA. 92506

Letter I-874

Tim Martin
March 9, 2023

I-874.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: CHRISTINE MARTIN <timnchrismartin@aol.com>
Sent: Thursday, March 9, 2023 2:29 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Tim Martin
timnchrismartin@aol.com
5933 Shaker Dr.
Riverside, CA. 92506

Letter I-875

Tim Martin
March 9, 2023

I-875.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Tom Schneider <trschneider3@gmail.com>
Sent: Thursday, March 9, 2023 9:19 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. I-876.1

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I-876.1 Cont.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

I have three small children, so I am passionate about this issue. Air quality is already poor enough in this area that it is one of my top health concerns for them. It would be heartbreaking to see this problem increase in our neighborhood instead of moving in a positive direction.

I-876.2

Thank you for the opportunity to comment.

Sincerely,

Thomas R. Schneider
8536 Chesterfield Rd
Riverside, CA 92508

Letter I-876

Thomas R. Schneider
March 9, 2023

I-876.1 This comment is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-876.2 This comment expresses concern about air quality. Recirculated Section 4.2, Air Quality, and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts identified in the Draft EIR.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Thursday, March 9, 2023 11:11 PM
To: Dan Fairbanks
Cc: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
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medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
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3. Alternate plan #3: The State or County Park Approach
· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
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These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.
Sincerely,
Veronica Juarez
Orangecrest 92508
vjuarez0326@gmail.com

Letter I-877

Veronica Juarez
March 9, 2023

I-877.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Yolanda Melchor <melchor_y@yahoo.com>
Sent: Thursday, March 9, 2023 1:01 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks: As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email. Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant. 1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement. · Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. · Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan). · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County. 2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park. · Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. · Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation

opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB. · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB. 3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA). · Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire. · Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5. · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities. These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area. Thank you for allowing me to provide comments on this project.

Sincerely,
Yolanda Elias
Neighbor
Mother
Teacher
Community member

Letter I-878

Yolanda Elias
March 9, 2023

I-878.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Abdallah Karim <akarim23@gmail.com>
Sent: Friday, March 10, 2023 9:40 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. I-879.1

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

I-879.1 Cont.

4. A sports complex including Soccer Fields, Rock climbing, mountain biking, and many other sports-related activities. As a trainer and former college athlete, I would love to help with this initiative where our youth and adults can leverage them.

I-879.2

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to

I-879.3

consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

I-879.3 Cont.

Thank you for allowing me to provide comments on this project.

Sincerely,
Abdallah Karim
92508

Letter I-879

Abdallah Karim
March 10, 2023

I-879.1 This comment is Form Letter H – Alternatives. As such, in response to this comment, please see Topical Response 8 – Alternatives.

I-879.2 This comment suggests an alternative consisting of a sports complex. While developing the entire site as a sports complex would achieve Project Objectives related to open space and recreational uses at the Project site, such an alternative would not be consistent with the intent of the March JPA General Plan, which in part identifies, "commercial, business park and industrial development are needed to recapture the economic loss attributed to base realignment. The development and reuse within the March JPA Planning Area will further the economic recovery of the region and will advance toward an equitable balance between jobs provided within the Western Riverside County subregion and the availability of housing. Land set aside at appropriate locations provide for commercial, industrial development, and job creating commerce. Development of business park and industrial land within the Planning Area should focus on commerce and industrial uses which provide employment opportunities, and capture upon the unique opportunities available at March." Because a sports complex alternative would generate minimal new employment opportunities, this Alternative was not evaluated further. The Project includes an approximately 60-acre park with active and passive recreational uses and a 445.43-acre Conservation Easement with existing trails for passive recreational use.

I-879.3 This comment is the same as the last paragraph of Form Letter H – Alternatives. As such, in response to this comment, please see Topical Response 8 – Alternatives.

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From: Abdallah Karim <akarim23@gmail.com>
Sent: Friday, March 10, 2023 9:43 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? Warehouse jobs are barely making ends meet today. Create an alternate plan that can make this community thrive. There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16? C

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate. The fact that we have to tell you this is ludicrous and prove neither the JPA or developers have done their duties.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is

not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project. Do you even care what happens to the residents that live here today?

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

<include name, address, email in signature line>

Letter I-880

Abdallah Karim
March 10, 2023

I-880.1 This comment letter is Form Letter F – Jobs with the addition of: "Warehouse jobs are barely making ends meet today. Create an alternate plan that can make this community thrive." And "fact that we have to tell you this is ludicrous and prove neither the JPA or developers have done their duties." Regarding alternatives, please see Topical Response 8 – Alternatives. The modifications to the form letter do not raise any new or different environmental issues. As such, in response to this comment, please see Form Letter F Response.

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From: Abdallah Karim <akarim23@gmail.com>
Sent: Friday, March 10, 2023 9:45 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-881.1

Do you realize how much traffic and pollution will be generated by the trucks that will pollute our neighborhoods? There are 3 schools and 2 major parks all within 1.5 mile radius. Why have you conveniently left out analysis from 215 and Van Buren? I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? I-881.2 I-881.3

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

I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. Our roads and community are not a dumping ground for warehouses. I-881.4

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing I-881.5

warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

I-881.5 Cont.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
<include name, address, email in signature line>

Letter I-881

Abdallah Karim
March 10, 2023

I-881.1 This comment is the same as the first paragraph of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-881.2 This comment notes that three schools and 2 parks are within a 1.5-mile radius of the Project site and questions why the analysis did not include the 215 and Van Buren. Recirculated Section 4.2, Air Quality and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts identified in the Draft EIR.

Environmental impacts to sensitive receptors surrounding the Project site were considered and impacts to these receptors are discussed throughout the Draft EIR. In response to concerns regardingI-215 and Van Buren, please see Form Letter G Response.

I-881.3 This comment is the same as Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

I-881.4 This comment expresses general opposition to the construction of warehouses and does not raise any issues or concerns with the environmental analysis included within the Draft EIR. As such, no further response is provided.

I-881.5 This comment is the same as the concluding three paragraphs of Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

From: Abdallah Karim <akarim23@gmail.com>
Sent: Friday, March 10, 2023 9:48 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-882.1

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts. Yet even with this limited analysis and information that was conducted, you still continue to move on with this project. This baffles me and proves the JPA cares nothing about fulfilling their duties to their own charter and is more focused on filling their own pockets. I-882.2

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. I-882.3

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site? Why do you continue disregarding our comments? Look at better practices that other developers have done already and be a leader. I-882.4

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during I-882.5

construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I-882.5 Cont.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected? Or like the rest of the EIR, you simply don't care and will continue moving forward?

I-882.6

Thank you for the opportunity to comment.

Sincerely,
Abdallah Karim
92508

Letter I-882

Abdallah Karim
March 10, 2023

I-882.1 This comment is the same as the first two paragraphs of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-882.2 This comment expresses dissatisfaction with the JPA and does not raise any issues or concerns with the environmental analysis included within the Draft EIR. As such, no further response is provided.

I-882.3 This comment is the same as the third and fourth paragraphs of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-882.4 This comment is general opposition and does not raise any issues or concerns with the environmental analysis included within the Draft EIR. As such, no further response is provided.

I-882.5 This comment is the same as the concluding three paragraphs of Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-882.6 This comment is general opposition and does not raise any issues or concerns with the environmental analysis included within the Draft EIR. As such, no further response is provided.

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From: Abdallah Karim <akarim23@gmail.com>
Sent: Friday, March 10, 2023 9:49 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options. How do you continue to ignore the requests of the community that is surrounded by the land that your charter claims to protect?

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies? Why are you still moving forward with no legitimate response to us?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as

shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,
Abdallah Karim
92508

Letter I-883

Abdallah Karim
March 10, 2023

I-883.1 This comment letter is Form Letter E – Project Consistency with the addition of: "How do you continue to ignore the requests of the community that is surrounded by the land that your charter claims to protect?" and "Why are you still moving forward with no legitimate response to us?" The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter E Response.

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Letter I-884

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From: Abdallah Karim <akarim23@gmail.com>
Sent: Friday, March 10, 2023 9:52 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area. I-885.1

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.
6. Why are you selectively performing an analysis when you know the realities and truth of what the land contains? I-885.2
7. What analysis has been performed to map the impact to the residents? Is there a heat-map that shows the contaminants and hazardous waste particles that will fill our skies and have our children inhale them? I-885.3

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers. I-885.4

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

I-885.4
Cont.

Thank you for allowing me to provide comments on this project.

Sincerely,
Abdallah Karim
92508

Letter I-885

Abdallah Karim
March 10, 2023

I-885.1 This comment letter is the same as the first three paragraphs of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

I-885.2 This comment questions the scope of the analysis. In response to this comment, see Recirculated Section 4.8, Hazards and Hazardous Materials.

I-885.3 This comment questions what analysis has been done about how contaminants could affect residents. In response to this comment, see Recirculated Section 4.8, Hazards and Hazardous Materials.

I-885.4 This comment is the same as the last five paragraphs of Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Abdallah Karim <akarim23@gmail.com>
Sent: Friday, March 10, 2023 9:54 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. **Why did you conduct the plant survey during a drought year?** How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?
3. How will you ensure such rare plants thrive after you leave?
4. Why does the JPA and report selectively analyze to its benefit instead of following industry practices?

I-886.1
I-886.2
I-886.3

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

I-886.4

Thank you for allowing me to provide comments on this project.

Sincerely,

Abdallah Karim
92508

Letter I-886

Abdallah Karim
March 10, 2023

I-886.1 This comment is the same as the first four paragraphs of Form Letter C –Biological Resources. As such, in response to this comment, please see Form Letter C Response.

I-886.2 This comment raises concerns regarding impacts to rare plants. Section 4.3, Biological Resources, of the Draft EIR discloses that there are no federally or state-listed plant species detected in the study area. One CRPR 1B.1 species, smooth tarplant, has a moderate potential to occur within the Study Area, but was confirmed absent during protocol surveys. No other special-status species have a moderate or high potential to occur based on the lack of suitable habitat on-site. As such, no impacts to special-status plant species would occur.

I-886.3 This comment asserts that the analysis is selective. The analysis within Section 4.3, Biological Resources, is comprehensive and follows all industry standards with respect to analyzing potential impacts to biological resources. The comment does not cite any specific issues or concerns with the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-866.4 This comment is the same as the last three paragraphs of Form Letter C –Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Abdallah Karim <akarim23@gmail.com>
Sent: Friday, March 10, 2023 9:57 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? I live in the community and am telling you the impact will be MORE THAN SIGNIFICANT. How can you tell me how my community will be impacted? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. Please also do not use images that we saw in the "community meeting" as they conveniently were taken at angles that do not show the real aesthetic impact.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,
Abdallah Karim
92508

Letter I-887

Abdallah Karim
March 10, 2023

I-887.1 This comment letter is Form Letter A – Aesthetics with the addition of: "I live in the community and am telling you the impact will be MORE THAN SIGNIFICANT. How can you tell me how my community will be impacted?" and "Please also do not use images that we saw in the 'community meeting' as they conveniently were taken at angles that do not show the real aesthetic impact." These modifications do not raise any new or different issues. As such, in response to this comment, please see Form Letter A Response.

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Letter I-888

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Letter I-889

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From: Andrew Larratt-Smith <andrew.larrattsmith@gmail.com>
Sent: Friday, March 10, 2023 4:56 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Andrew Larratt-Smith

Letter I-890

Andrew Larratt-Smith
March 10, 2023

I-890.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: innorehab@aol.com
Sent: Friday, March 10, 2023 3:42 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau

Dan,

I hope all is well! I am writing to you in opposition to the West Campus Upper Plateau Project. Being that we have worked together at the MJP Authority you are aware of my concerns with number of warehouses being built especially towards the end of my service with MJP. As a commissioner of approximately 14 years, I supported my share of warehouses. However, there comes a time when the number of warehouses overwhelms the infrastructure of roads and freeways. Although attempts are made to try to mitigate them, it is often patch work and does not solve the overriding problem of emissions, noise, traffic and environmental impacts. As warehouses begin to encroach on neighborhoods, we see Cities broaden their buffer areas, place a moratorium on buildings and place more restriction on large 24 hours facilities due to the impacts on the quality of life to the neighborhood. This proposed West Campus Upper Plateau is no different. It definitely will impact the neighbors with noise form trucks, forklifts, refrigerators and refrigerator trailers as well as the constant movement of vehicles during nighttime hours. It is also disheartening to know that Randall Lewis is the responsible party for this development. He has long been an advocate for sustainable building and development. He offered a Fellowship Grant for the Lyle Center for Regenerative Studies which included outreach in sustainable and regenerative agriculture at Cal Poly Pomona as recent as last year. In addition, SCAG named Randall Lewis the President's "Award for Sustainability Leader of the Year". His company is regarded as an "industry leader in promoting the arts, education, HEALTHY LIVING AND SUSTAINABLE DEVELOPMENT INITIATIVES. This includes increasing community awareness of community health. At UCR, his seminars focus on air and water quality, infrastructure planning, affordable housing, designing healthier communities, transit and social issues. All of this unfortunately and disappointedly contrary to what we see in his development here.

I-891.1

I-891.2

I-891.3

I ask you share this email with my past colleagues and encourage them to reduce the size of the development, encourage a greater buffer and allow for more open space to partially create a project that the developer teaches in his seminars.

Dan, as always thank you for time and the work you do. To my past colleagues, thank for your time and efforts. We often speak of the quality of life for our community and constituents, We have the opportunity to act on this with a developer who has preached this for many years. Unfortunately, this plan falls short of his advocacy.

I-891.4

Andy Melendrez

Letter I-891

Andy Melendrez
March 10, 2023

I-891.1 This comment expresses general opposition to the Project and raises concern for impacts to infrastructure (i.e., roads and freeways) as a result of new warehouses, including the Project. Implementation of the Project includes infrastructure improvements to meet the needs of the planned land uses on site. As further detailed in Recirculated Chapter 3, Project Description, the Project would include the installation of utility and roadway networks connecting to and throughout the Specific Plan Area. Additionally, roadway improvements would be constructed in the Project area, as stipulated in PDF-TRA-1. Through PDF-TRA-4, the Project will pay its fair share to address operational deficiencies at off-site intersections. Commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[11] The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

The comment further references actions by other jurisdictions in relation to warehouses. See Recirculated Section 4.10, Land Use and Planning, for a discussion of the Project's consistency with the Good Neighbor Guidelines of the County of Riverside and Topical Response 4 – Project Consistency for a discussion of the Project's consistency with the City of Riverside Good Neighbor Guidelines. The purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses.

I-891.2 This comment asserts the Project would result in noise impacts related to operations, such as noise from trucks, forklifts, refrigerators and refrigerator trailers, as well as nighttime traffic noise. The Draft EIR analyzes impacts related to air quality, noise, and traffic within Recirculated Section 4.2, Air Quality,

[11] https://www.dmv.ca.gov/portal/dmv-research-reports/department-of-motor-vehicles-dmv-performance-reports/where-did-your-2020-fees-go/

and Sections 4.11, Noise, and 4.15, Transportation, respectively. Further, the Project would implement a Conservation Easement which would provide a buffer between the proposed Specific Plan Area and the nearby residential areas surrounding the Project site. Regarding 24-hour operations, Section 4.11, Noise, includes analysis with an assumption for 24-hour operations in order to present the potential worst-case noise condition on site. Moreover, the noise analysis assesses a variety of noise sources, including loading dock activity, roof-top air conditioning, parking lot vehicle movements, and truck movement all operating at the same time. To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the March JPA, County of Riverside and City of Riverside exterior noise level standards at the nearest noise-sensitive receiver locations. Table 4.11-27 of the Draft EIR shows the operational noise levels associated with Project would not exceed the daytime and nighttime exterior noise level standards. Therefore, the operational noise impacts are considered less than significant at the nearby noise-sensitive receiver locations, and no mitigation is required. No changes or revisions to the EIR are required in response to this comment.

I-891.3 This comment notes the Project Applicant's history with the Project area and background around sustainability. This description does not raise direct issues, questions or concerns about the adequacy of the environmental analysis in the Draft EIR.

Additionally, the Draft EIR addresses topics related to community health, such as water quality, infrastructure planning, affordable housing, and designing healthier communities with transit. See Sections 4.9, Hydrology and Water Quality, 4.12, Population and Housing, and 4.15, Transportation, for discussion on water quality, population and housing, and transportation. Recirculated Section 4.10, Land Use and Planning, includes a consistency analysis with the March JPA draft Environmental Justice Element. However, the Draft EIR does not address social issues in accordance with Section 15064(e) of the State CEQA Guidelines, "economic and social changes resulting from a project shall not be treated as significant effects on the environment." No changes or revisions to the EIR are required in response to this comment.

I-891.4 This comment requests a Project alternative with a reduction in size. Chapter 6, Alternatives, of the Draft EIR analyzed Alternative 2 – Reduced Development Alternative, which would result in a reduction of the developable acreage in the Campus Development by approximately 18% and an increase in Open Space by approximately 60% in the Specific Plan Area compared to the proposed Project. The Draft EIR also analyzed Alternative 3 – Restricted Industrial Building Size Alternative, which would result in a reduction of 244,550 square feet of potential industrial development (approximately 20% of the potential industrial development for the 56.27-acre Industrial parcel).

From: tonymusumba@yahoo.com
Sent: Friday, March 10, 2023 12:05 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the

past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Alice Musumba,
Orangecrest Resident
Zip 92508

Letter I-892

Alice Musumba
March 10, 2023

I-892.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Andrew Silva <aesilva4@earthlink.net>
Sent: Friday, March 10, 2023 3:36 PM
To: Dan Fairbanks
Subject: Andrew Silva - (Wildlife and Biology) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304.
Attachments: Andrew Silva - (Wildlife and Biology) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304..docx

Dear Mr. Fairbanks:

Please find attached a comment letter on the Draft EIR for the West Campus Upper Plateau Project related to wildlife and biology. I-893.1

Thank you,

Andrew Silva

19940 Cuyama Lane

Riverside, CA 92508

(951) 237-4231

Andrew Silva
19940 Cuyama Lane
Riverside, CA 92508
Aesilva4@earthlink.net
(951) 237-4231

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA, 92518
fairbanks@marchjpa.com

Re: Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304. (Wildlife and Biology)

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

Anecdotally, I have lived in the Orangecrest area for more than three decades, having raised two kids and two grandkids – and said goodbye to my beloved wife – during a good life in this community. We were here before Canyon Crest Drive opened between Alessandro and Central, and when it did open, it was common to see a hawk on every other light post down the hill as I drove my kids to school (before King H.S. was built). On Sundays back in the day, to access (sneak into) the bunker area, I would have to squeeze my mountain bike between the loosest strands of barbed wire I could find and then my wife and myself so we could have our run/ride with our dogs around the bunker road. Eagles were not uncommon. We'd see and hear the coyotes yipping and wailing. I once had an entertaining and almost scary encounter with a pair of burrowing owls. I-893.2

In the past year and a half or so, I have been out there almost every day with my little dog and my big dog. I get excited on those depressingly rare occasions I see a hawk. There *is* a pair of hawks on one of the few trees out on the west side of the property, so always happy to see one or both of them. I've seen coyotes recently and I'm always scanning for fear of my little walking burrito. I've scared up a jackrabbit less than a handful of times and I don't remember the last time that happened.

I remember how excited I was long ago when I went out there for a ride and saw the no-trespassing signs because the area was a kangaroo rat preserve. That meant the area would be preserved! We did our due diligence before we moved here, and at no point could we have envisioned a heavy industrial project less than a football field from our homes. At some point, my wife and I had looked for a new, more rural, area. We could

not find any area that could make us as happy as this place, and that the bunker area was to be preserved was a big part of the decision that this would always be our home.

I-893.2 Cont.

I am not a trained biologist, but my observations over a sustained period clearly demonstrate that the diversity, number, and frequency of a number of species has severely declined. Further development, especially such intense, heavy industrial development with high levels of pollution, heavy-duty truck traffic, noise and light, will make preservation of the existing struggling ecosystem impossible.

Can the thin open space areas, which are no more than inadequate buffers between the heavy industrial area and neighbors' backyards, support the remaining wildlife in such small areas, and can wildlife be sustained in such an impacted area while also under the stressors of pollution, light, noise and truck traffic?

I-893.3

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

<u>Wildlife</u>

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

<u>Plant life</u>

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

I-893.4

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project. I-893.4 Cont.

Sincerely,

Andrew Silva

Letter I-893

Andrew Silva
March 10, 2023

I-893.1 This comment is introductory and refers to an attached letter. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-893.2 This comment discusses personal experience at the Project site and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. This comment states the Project site was identified as habitat for Stephens Kangaroo Rat (SKR) and not to be developed. As discussed in Recirculated Section 4.10, Land Use and Planning, since the development of the March JPA General Plan in 1999, the Project site has been designated for development. Although Exhibit 5-1 of the March JPA General Plan identifies the former Weapons Storage Area as SKR Open Space and the remainder of the Project site as SKR Management Area, the March JPA General Plan states that " the lands currently designated for SKR management and open space purposes will be available for development."

Figure 1-4, Land Use Plan, of the March JPA General Plan designates the former Weapons Storage Area as Park/Recreation/Open Space and the remainder of the Project site as Business Park. The swap of March JPA lands, including the Project site, for more and better quality SKR habitat was the subject of the 2012 Settlement Agreement with the Center for Biological Diversity and San Bernardino Valley Audubon Society (Appendix S). Under the CBD Settlement Agreement, the land uses were inverted, with the Weapons Storage Area identified for development, along with a 60-acre park, and the remainder of the Project site identified as a conservation easement (see Figure 3-4 of Recirculated Chapter 3, Project Description). The Project's potential direct and indirect impacts to SKR and its habitat are evaluated within Section 4.3, Biological Resources, of the Draft EIR. With implementation of MM-BIO-1 (Best Management Practices), MM-BIO-3 (Operation-Related Indirect Impacts to Special-Status Wildlife), and MM-BIO-4 (Stephens' Kangaroo Rat Avoidance and Mitigation), the Project's direct and indirect impacts to SKR and its habitat would be less than significant.

I-893.3 This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required.

I-893.4 This comment is the same as Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Andrew Silva <aesilva4@earthlink.net>
Sent: Friday, March 10, 2023 3:40 PM
To: Dan Fairbanks
Subject: Andrew Silva (Aesthetics, Light, Noise, Quality of Life) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304
Attachments: Andrew Silva (Aesthetics, Light, Noise, Quality of Life) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304.docx

Dear Mr. Fairbanks:

Please find attached my comment letter on the Draft EIR for the West Campus Upper Plateau Project; State Clearinghouse Number 2021110304, related to aesthetics, light, noise and quality of life. I-894.1

Thank you,

Andrew Silva

19940 Cuyama Lane

Riverside, CA 92508

(951) 237-4231

Andrew Silva
19940 Cuyama Lane
Riverside, CA 92508
Aesilva4@earthlink.net
(951) 237-4231

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA, 92518
fairbanks@marchjpa.com

Re: Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304.
(Aesthetics/Noise/Light/Quality of Life)

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority Draft Environmental Impact Report on the West Campus Upper Plateau Project.

I am a 30-plus year resident of the Orangecrest neighborhood, and aesthetics, noise, light and quality of life are the issues that will have the most devastating impacts to the local community and residents.

First, a baseline of the project area as it sits now. One of the small bittersweet pleasures of a summer night, is hearing the shouts and cheers of family and friends during Little League and other events through our open bedroom window. (Bittersweet because with the kids and grandkids gone, those sounds always brought back fond memories of our time as parents of that age.)

As I have walked daily with my dogs across the project area, despite proximity to busy roads, and the steady hum of suburban life, the quiet of the area is striking. It may not be perfect silence, but it provides comfort, relief and an almost incongruous feeling of solitude and peacefulness. But sound also travels far and efficiently due to the topography and other conditions. Even when I am approximately 1,000 feet from homes, I can still easily hear people conducting routine activities in their backyards.

For those who live near the project site, the area is quiet, dark and beautiful.

To suggest the impacts can be mitigated to less than significant defies physics and common sense.

I-894.2

I-894.3

Despite the mitigation measures for light spillage, the project site immediately next to neighbors will glow light a football stadium at night, and will be visible for miles. Even a match on a clear night can be visible over great distances even when the measurable light reaching any location is minuscule.

I-894.3 Cont.

Noise, now nonexistent from the site, will absolutely destroy the peace of mind, solitude and quality of life of community residents and families. Rather than the relatively peaceful silence and the occasional squawk of a bird or howl of a coyote that has defined this community for three generations, the back-up beeping of trucks, the clatter of 40-foot steel shipping containers, the grind and growl of heavy trucks, and other intrusive sounds will pierce the night into neighbors' backyards and bedrooms, turning the current almost bucolic atmosphere into a cacophony of chaos and stress.

I-894.4

For aesthetics, though the total project area is less than one and a half square miles, it provides a visual respite from the endless concrete and stucco that define our suburban landscape. In my younger days, I was blessed to backpack some of the most beautiful places in the American west.

I am currently out on the project site almost daily with my two dogs, and, not often enough, on my mountain bike. Though always in plain sight of civilization – houses, the church, the relics on the property itself, the fencing, light poles and the bunkers themselves – I experience a surprising sense of connection, openness and freedom as I look out across the property, capturing some of the same feelings I enjoyed on my most epic backpacking trips. Except that this place is three-minute car or bike ride for me, my dogs and my neighbors to treasure on a daily basis, rather than travelling to a famous scenic area during those too-rare and too-brief vacations.

I-894.5

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. I must comment on the viewpoints in the EIR at the south end of the project. The south side of the project is at a higher elevation than the rest of the property and from those vantage points, one looks down over the project. To suggest that having the two highest mountains in Southern California still visible on the horizon means the visual impacts are less that significant is insulting.

I-894.6

Despite the settlement with the Center for Biological Diversity and the preservation of open space in the project description, building a sea of uniform concrete mega-warehouses will destroy the visual character of the area and will be a visible, intrusive blight to this beautiful neighborhood in perpetuity.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and the plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no

I-894.7

rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for generations to come. Please don't allow one final grand act of poor land use planning be your lasting legacy.

I-894.7
Cont.

Sincerely,

Andrew Silva

Letter I-894

Andrew Silva
March 10, 2023

I-894.1 This comment is introductory and refers to an attached letter. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-894.2 This comment discusses personal experience at the Project site and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-894.3 This comment expresses concern about nighttime lighting. As discussed in Section 4.1, Aesthetics, of the Draft EIR, PDFs are incorporated into the Project through the proposed Specific Plan such that light trespass is minimized. The following PDFs specifically relate to lighting:

PDF-AES-2 All exterior lighting shall minimize glare and "spill over" light onto public streets, adjacent properties, and Conservation Easement by using downward- directed lights and/or cutoff devises on outdoor lighting fixtures, including spotlights, floodlights, electrical reflectors, and other means of illumination for signs, structures, parking, loading, unloading, and similar areas. Where desired, illuminate trees and other landscape features by concealed uplight fixtures (on- and off-site).

PDF-AES-3 Limit light spillover or trespass to one-half foot-candle or less, measured at the property line for development adjacent to the Conservation Easement (off-site). This shall be confirmed through point-by-point photometric study.

PDF-AES-4 Limit light spillover or trespass to one-half foot-candle or less, measured from within five feet of any adjacent property line for development adjacent to nonresidential uses (on-site). This shall be confirmed through point-by-point photometric study.

PDF-AES-5 Lighting fixtures shall have a similar design, materials, fixture color, and light color. Use of LED lighting shall be required for parking lot lighting; parking lot lighting shall be within 100 Kelvin of 2700 Kelvin; other lighting techniques for accent lighting shall be allowed (on- and off-site).

PDF-AES-6 Lights shall be unbreakable plastic, recessed, or otherwise designed to reduce the problems associated with damage and replacement of fixtures (on- and off-site).

PDF-AES-7 Neon and similar types of lighting are prohibited in all areas with the Specific Plan Area (on-site).

PDF-AES-11 Use exterior lights to accent entrances, plazas, activity areas, and special features (on-site).

PDF-AES-12 High-Pressure (HPS) light fixtures are prohibited for site lighting (on-site).

PDF-AES-13 Lighting is prohibited that could be mistaken for airport lighting or that would create glare in the eyes of pilots of aircraft using the nearby March Air Reserve Base (on-site).

PDF-AES-14 All exterior on-site light fixtures shall be fully shielded with no light emitted above the horizon (on-site).

PDF-AES-15 Maximum on-site lighting wattage is 750 (on- and off-site).

PDF-AES-16 Maximum height of on-site exterior lighting for buildings is 25 feet; sports fields lighting may have a maximum height of 50 feet and shall be located no closer than 450 feet from residences (on site).

In Section 4.1, Aesthetics, of the Draft EIR, an analysis of Project lighting associated with both the Campus Development and the Park is provided. As demonstrated therein, with incorporation of the above PDFs as well as MM-AES-2, which requires the Project applicant to submit a photometric study as part of the building permit application that is subject to March JPA review and approval, and MM-AES-3, which required use of anti-reflective coatings on the PV panels; this measure also requires that the Project Applicant submit a glint and glare study to be approved by March ARB that analyzes potential effects the system(s) could have on aviation, impacts would be less than significant.

I-894.4 This comment expresses concerns about noise. Section 4.11, Noise, of the Draft EIR, includes analysis with an assumption for 24-hour operations in order to present the potential worst-case noise condition on site. Moreover, the noise analysis assesses a variety of noise sources, including loading dock activity, roof-top air conditioning, parking lot vehicle movements, and truck movement all operating at the same time. To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the March JPA, County of Riverside and City of Riverside exterior noise level standards at the nearest noise-sensitive receiver locations. Table 4.11-27 of the Draft EIR shows the operational noise levels associated with Project would not exceed the daytime and nighttime exterior noise level standards. Therefore, the operational noise impacts are considered less than significant at the nearby noise-sensitive receiver locations, and no mitigation is required. No changes or revisions to the EIR are required in response to this comment.

I-894.5 This comment raises concerns regarding the loss of recreational open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses.

I-894.6 This comment questions the standards used to evaluate aesthetic impacts and visual impacts from the Project. In response to this comment, please see Topical Response 1 – Aesthetics.

I-894.7 This comment is the last two paragraphs of Form Letter A, Aesthetics. In response, see Form Letter A Response.

From: Andrew Silva <aesilva4@earthlink.net>
Sent: Friday, March 10, 2023 3:41 PM
To: Dan Fairbanks
Subject: Andrew Silva (Air Quality) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304
Attachments: Andrew Silva (Air Quality) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304.docx

Dear Mr. Fairbanks:

Please find attached my comment letter on the Draft EIR for the West Campus Upper Plateau Project; State Clearinghouse Number 2021110304, related to air quality. I-895.1

Thank you,

Andrew Silva

19940 Cuyama Lane

Riverside, CA 92508

(951) 237-4231

Andrew Silva
19940 Cuyama Lane
Riverside, CA 92508
Aesilva4@earthlink.net
(951) 237-4231

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA, 92518
fairbanks@marchjpa.com

Re: Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304. (Air Quality)

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

I have been directly and indirectly involved in air 23 issues for more than two decades. My last work assignment before I retired was as a board consultant to a South Coast Air Quality Management District Governing Board member. I was in the room during all the stakeholder meetings over a number of years as AQMD drafted its Rule 2305, the Indirect Source Rule for warehouses.

I-895.2

The DEIR fails to properly consider the cumulative impacts on sensitive receptors and all nearby residents due to the heavy pollution burden already borne by residents of the South Coast Basin and particularly the Inland Empire.

Numerous studies have demonstrated that exposure to higher levels of pollution constricts the lung capacity of young children into adulthood. Given the Inland Empire has the worst ozone pollution in the nation and is out of attainment for PM2.5, all additional sources increase the health impacts, especially to growing children.

Proximity to an air pollution source also impacts the level of pollution and increases the health risk to residents. Note that the project area is used regularly by the Woodcrest Christian School Mountain Bike team, and is popular among mountain bikers throughout the area, including myself, and I have seen more and more families with young children utilizing the dirt roads and trails, in addition to numerous regular dog walkers.

I-895.3

The trails where these young people, and old people like me, ride bikes and where families walk with their kids and dogs, will be only a few feet away from the project and

its hundreds of trucks and cars. While ozone is a regional problem, the ozone precursor of directly emitted NOx from heavy trucks poses a localized and immediate health threat, especially as these teenagers' hearts are pounding at 180 beats per minute while inhaling large quantities of NOx and diesel particulate matter.

I-895.3 Cont.

I am also concerned about the state of clean truck technology. I support more rigorous mandatory mitigation requirements for clean vehicles, should this project be approved. While clean truck technology exists and is maturing, it remains for now prohibitively expensive and it is severely limited by the lack of infrastructure to support it. Edison has already expressed concern that the existing local grid cannot support the existing and permitted warehouses, much less the exponentially larger load required to charge medium and heavy-duty trucks. Even if the most stringent mitigation deadlines are imposed, they may not be technologically feasible.

I-895.4

To be clear, there are no mitigation measures that will reduce the impact to below significant. Heavy industry *does not belong* adjacent to long-established residential communities. In addition to the adjacent Grove Church, which includes an active and thriving pre-school, as well as athletic fields that receive regular use, Orange Terrace Community Park is only a few steps farther and is used daily by hundreds of families for baseball, softball, soccer and other activities.

I-895.5

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. There are numerous deficiencies in the analysis and underestimates the air quality impacts.

Your analysis further does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

I-895.6

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group

should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents).
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? Which agencies will have which enforcement responsibilities, e.g., Riverside County, South Coast AQMD, CHP, etc.? How will you assure adjacent residents that our interests will be protected?

I-895.6
Cont.

Thank you for the opportunity to comment.

Sincerely,

Andrew Silva

Letter I-895

Andrew Silva
March 10, 2023

I-895.1 This comment is introductory and refers to an attached letter. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-895.2 This comment cites personal experience with SCAQMD and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR are raised. As such, no further response is provided and no revisions to the Draft EIR are required.

I-895.3 This comment raises concerns regarding health risks due to Project emissions. The Draft EIR and Recirculated Draft EIR assessed the Project's health risks in Section 4.2, Air Quality and Appendix C-2. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Section 4.2, Air Quality, of the Recirculated Draft EIR, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts identified in the Draft EIR.

I-895.4 This comment raises concerns regarding clean truck technology. MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed. PDF-GHG-1 requires conduit to be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. MM-AQ-11 requires main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available.

I-895.5 This comment notes sensitive receptors surrounding the Project site. The analysis within Recirculated Section 4.2, Air Quality, and specifically Threshold AQ-3, identified each of these sensitive receptors and evaluated whether the Project would expose sensitive receptors to substantial pollutant concentrations. As demonstrated therein, all impacts to sensitive receptors would be less than significant.

I-895.6 This comment is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

From: Andrew Silva <aesilva4@earthlink.net>
Sent: Friday, March 10, 2023 3:43 PM
To: Dan Fairbanks
Subject: Andrew Silva (Alternatives Analysis) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304
Attachments: Andrew Silva (Alternative Analysis) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304.docx

Dear Mr. Fairbanks:

Please find attached my comment letter on the Draft EIR for the West Campus Upper Plateau Project; State Clearinghouse Number 2021110304, related to the alternatives analysis. I-896.1

Thank you,

Andrew Silva

19940 Cuyama Lane

Riverside, CA 92508

(951) 237-4231

Andrew Silva
19940 Cuyama Lane
Riverside, CA 92508
Aesilva4@earthlink.net
(951) 237-4231

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA, 92518
fairbanks@marchjpa.com

Re: Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304. (Alternatives analysis)

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority Draft Environmental Impact Report on the West Campus Upper Plateau Project.

Easily the area where the DEIR is most inadequate is in its lack of alternatives analysis. The statutorily required no-build alternative, which I would support, is the only non-industrial alternative considered.

Making minor downsizes and insignificant tweaks to the project does not fulfill the CEQA requirement for analyzing alternatives. During the past year-plus, residents have floated any number of ideas, from solar to other kinds of profitable developments.

We now take the opportunity to present three alternatives the community would enthusiastically support, any of which would provide generational, sustainable and resilient economic and social benefits to the local community and, indeed, to the entire region.

I-896.2

For policymakers, this is an opportunity to set the area on a visionary path that will establish a legacy for which they can be proud, and which will be admired by the community for generations to come. (Think Frederick Olmstead and New York's Central Park, or the decision to repurpose the Marine Corps Air Station at El Toro into the Orange County Great Park.)

As discussed in a number of other comments you have received, this proposed project as envisioned violates the March JPA's own statutorily controlling planning documents, it violates the Commission members obligations to protect their constituents, and violates common sense and long established planning doctrine related to siting heavy industry next to residential uses. (Indeed most of the numerous environmental justice

controversies I have witnessed over the past 30 years are the direct result of incompatible and harmful land use decisions by local governments.)

This area is a diminishing treasure in the Riverside area with little open space remaining for wildlife, recreation, familial bonding and spiritual renewal. Paving over this area would be a tragedy during a time when the mental health of our communities, due to loneliness, isolation, stress from daily life and countless other stressors, requires supporting and encouraging connections to nature and each other.

Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. **Alternate plan #1: The Campus Approach**

Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

I-896.2 Cont.

Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. **Alternate plan #2: The Veterans Village Approach**

Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

I-896.2 Cont.

3. **Alternate plan #3: The State or County Park Approach**

Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project

meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

I-896.2 Cont.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for the opportunity to comment.

Sincerely,

Andrew Silva

Letter I-896

Andrew Silva
March 10, 2023

I-896.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-896.2 This comment suggests additional alternatives that should be considered. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Andrew Silva <aesilva4@earthlink.net>
Sent: Friday, March 10, 2023 3:45 PM
To: Dan Fairbanks
Subject: Andrew Silva (Community Engagement) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304
Attachments: Andrew Silva (Community Involvement) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304.docx

Dear Mr. Fairbanks:

Please find attached my comment letter on the Draft EIR for the West Campus Upper Plateau Project; State Clearinghouse Number 2021110304, related to community engagement. I-897.1

Thank you,

Andrew Silva

19940 Cuyama Lane

Riverside, CA 92508

(951) 237-4231

Andrew Silva
19940 Cuyama Lane
Riverside, CA 92508
Aesilva4@earthlink.net
(951) 237-4231

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA, 92518
fairbanks@marchjpa.com

Re: Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304. (Community Engagement)

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

Having proudly spent my career(s) both closely observing and working within local government, I find myself increasingly distressed over the (lack of) evolution of this project. I take it personally because it angers me to see an institution I revere fail so utterly in effectively involving the community in a decision that will affect generations of families, and severely impact the health and quality of life of the community they cherish.

I-897.2

The lack of imagination and any good-faith steps to seek alternatives that would at least reduce the inevitable harm to the community mean the DIER is inadequate.

I incorporate by reference the three alternative plans submitted by Riverside Neighbors Opposing Warehouses, all of which would greatly benefit the community and the entire region.

I-897.3

Alternative plans should consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. **Why did each of the alternative plans include 143 acres of industrial zoning?** The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. **Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.**

I-897.4

Under Planning Process C1F, the Final Reuse Plan (1996) reads: “Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base.” Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; **how is our feedback being “seriously” and “carefully” considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?**

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should “discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions**”** and **“**Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses.” **How does building 4.7 million square feet of industrial warehouses that have “significant and unavoidable” noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.**

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how ”the planning processing was designed to incorporate consensus of the adjacent communities, creation of a ‘Community Preference’ land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse” (Final Reuse Plan, 1996, p. II-v). **In what specific ways have you incorporated Community Preference in the development of your plan?**

I-897.4 Cont.

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for ‘Industrial/Warehousing’ uses and it explicitly shows ‘Industrial/warehousing’ land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen’s Kangaroo Rat.

Moreover, the Draft General Plan 2010 “Draft Vision 2030” Section 2.2.24 stated,

“The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space

d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

I-897.4 Cont.

Thank you for letting me comment on your project.

Sincerely,

Andrew Silva

Letter I-897

Andrew Silva
March 10, 2023

I-897.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-897.2 This comment expresses general opposition to the Project and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-897.3 This comment asks that a non-industrial alternative be considered. In response to this comment, please see Topical Response 8 – Alternatives.

I-897.4 This comment is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter D Response.

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From: Andrew Silva <aesilva4@earthlink.net>
Sent: Friday, March 10, 2023 3:47 PM
To: Dan Fairbanks
Subject: Andrew Silva (Hazardous Materials) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304
Attachments: Andrew Silva (Hazardous Materials) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304.docx

Dear Mr. Fairbanks:

Please find attached my comment letter on the Draft EIR for the West Campus Upper Plateau Project; State Clearinghouse Number 2021110304, related to hazardous materials. I-898.1

Thank you,

Andrew Silva

19940 Cuyama Lane

Riverside, CA 92508

(951) 237-4231

Andrew Silva
19940 Cuyama Lane
Riverside, CA 92508
Aesilva4@earthlink.net
(951) 237-4231

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA, 92518
fairbanks@marchjpa.com

Re: Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304. (Hazardous Materials)

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:

1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

I-898.2

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchlorothylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Andrew Silva

I-898.2
Cont.

Letter I-898

Andrew Silva
March 10, 2023

I-898.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-898.2 This comment is Form Letter D –Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Andrew Silva <aesilva4@earthlink.net>
Sent: Friday, March 10, 2023 3:49 PM
To: Dan Fairbanks
Subject: Andrew Silva (Jobs, Greenhouse Gases) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304
Attachments: Andrew Silva (Jobs, Greenhouse Gases) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304.docx

Dear Mr. Fairbanks:

Please find attached my comment letter on the Draft EIR for the West Campus Upper Plateau Project; State Clearinghouse Number 2021110304, related to jobs and greenhouse gases. I-899.1

Thank you,

Andrew Silva

19940 Cuyama Lane

Riverside, CA 92508

(951) 237-4231

Andrew Silva
19940 Cuyama Lane
Riverside, CA 92508
Aesilva4@earthlink.net
(951) 237-4231

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA, 92518
fairbanks@marchjpa.com

Re: Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304. (Jobs/Greenhouse Gas)

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority Draft Environmental Impact Report on the West Campus Upper Plateau Project.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

I-899.2

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+,

labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

I-899.2 Cont.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? There is discussion now of "dark warehouses" requiring so few workers that lights, heating and cooling may not be required. It is anticipated that warehouse jobs are the most likely to be lost to automation.

I-899.3

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

I-899.4

Thank you for allowing me the opportunity to comment.

Sincerely,

Andrew Silva

Letter I-899

Andrew Silva
March 10, 2023

I-899.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-899.2 This comment is the same as the majority of Form Letter F –Jobs. As such, in response to this comment, please see Form Letter F Response.

I-899.3 This comment asserts that warehouse jobs will be lost to automation. This comment is speculative in nature. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

I-899.4 This comment is the same as the concluding paragraphs of Form Letter F –Jobs. As such, in response to this comment, please see Form Letter F Response.

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Comment Letter I-900

From: Andrew Silva <aesilva4@earthlink.net>
Sent: Friday, March 10, 2023 3:50 PM
To: Dan Fairbanks
Subject: Andrew Silva (Traffic) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304
Attachments: Andrew Silva (Traffic) Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304.docx

Dear Mr. Fairbanks:

Please find attached my comment letter on the Draft EIR for the West Campus Upper Plateau Project; State Clearinghouse Number 2021110304, related to traffic. I-900.1

Thank you,

Andrew Silva

19940 Cuyama Lane

Riverside, CA 92508

(951) 237-4231

Andrew Silva
19940 Cuyama Lane
Riverside, CA 92508
Aesilva4@earthlink.net
(951) 237-4231

March 10, 2023

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA, 92518
fairbanks@marchjpa.com

Re: Comments on the West Campus Upper Plateau Project Draft Environmental Impact Report; State Clearinghouse Number 2021110304. (Traffic)

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

I have lived in Orangecrest for more than 30 years and before I retired I worked in downtown San Bernardino. During my morning commute, I would usually take surface streets down to the MLK on-ramp to the 215 to avoid the gridlock on the 60/215 interchange. One weekday afternoon I was able to stop by home for lunch, and as it was early afternoon, I thought it would be safe to take Van Buren to the 215. Wrong. An hour and a half later I made it to my desk. And that was several years ago before many of the numerous, recently built warehouses were dumping more and more heavy trucks onto the already congested freeway and surrounding surface streets, which I now avoid unless absolutely necessary. I-900.2

I have serious concerns about the traffic section of the document. First and foremost, **the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses.** The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. **How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary** I-900.3

freeways in the area? Why did you exclude known construction projects that have already been permitted to be built?

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
<include name, address, email in signature line>

I-900.3
Cont.

Letter I-900

Andrew Silva
March 10, 2023

I-900.1 This comment is an email transmittal of the comment letter submitted by the commenter. Specific comments regarding the Draft EIR are provided and responded to below.

I-900.2 This comment cites personal experience on local roadways and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR are raised. As such, no further response is provided and no revisions to the Draft EIR are required.

I-900.3 This comment is Form Letter G –Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Betty Anderson <bettysjam@earthlink.net>
Sent: Friday, March 10, 2023 1:56 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau
Attachments: March JPI letter.docx

Hello Mr. Fairbanks,

Please find attached my comment letter to the proposed project West Campus Upper Plateau. I-901.1

Betty Anderson
(951) 965-9485
11378 Pena Way
Jurupa Valley, CA 91752

Sent from Mail for Windows

March 10, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I am writing to offer my comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas, it is less than 1,500 foot range of residential homes. The Project fails to consider or provide non-industrial alternatives as consistently requested by the community. I-901.2

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. That is a standard statement that warehouses developers have been using for decades, and they still continue to be allowed to build these warehouses in this region. I-901.3

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction including but not limited to the World Logistics Center in Moreno Valley. In addition, there are numerous warehouses regionally that combined with this project that will adversely affect the air quality in our region. I am asking that project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, I believe it is important to be more conservative in truck trip rate projections-using the Rule 2305 numbers would almost double the daily truck trips. I-901.4

Over twenty years ago my daughter was a part of the University of California Children's Health Study. This study lasted ten years. The results of this study showed the harmful effects of diesel emissions on children's developing lungs Since that time there continues to be more and more warehouses built in this region without regards to the impact on those living in close proximity to them. I-901.5

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway, the 215/60 corridor, or the 60/215/91 Interchange, I-901.6

or the 60/15 interchange. These are routes that most of the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, Caltrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis especially since when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site. You also excluded major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built?

I-901.6
Cont.

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

I ask that the March JPA come up with a comprehensive plan for how these mitigations will be Implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets?

Thank you for the opportunity to comment.

Sincerely,

Betty A. Anderson
11378 Pena Way
Jurupa Valley, CA 91752
bettysjam@gmail.com

Letter I-901

Betty A. Anderson
March 10, 2023

I-901.1 This comment is introductory and refers to an attached letter. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-901.2 This comment letter is the same as the beginning of Form Letter B –Air Quality. As such, in response to this comment, please see Form Letter B Response.

I-901.3 This comment generally states that warehouse project environmental reviews have previously disclosed significant and unavoidable air quality impacts. This comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-901.4 This comment is a shortened version of Form Letter B –Air Quality. As such, in response to this comment, please see Form Letter B Response

I-901.5 This comment refers to the health effects of diesel particulate matter on children and adjacent residents. Recirculated Section 4.2, Air Quality and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance

threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts identified in the Draft EIR.

I-901.6 This comment is a shortened version of Form Letter G –Traffic. The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter G Response.

From: Brian Wardle <wardleb@gmail.com>
Sent: Friday, March 10, 2023 8:40 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents) 2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am

aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Brian Wardle
8230 Golden poppy Rd
Riverside 92508
Wardleb@gmail.com

Letter I-902

Brian Wardle
March 10, 2023

I-902.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Brian Wardle <wardleb@gmail.com>
Sent: Friday, March 10, 2023 8:42 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Brian Wardle
8230 Golden poppy Rd
Riverside 92508
Wardleb@gmail.com

Letter I-903

Brian Wardle
March 10, 2023

I-903.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Cindy <clchiek@gmail.com>
Sent: Friday, March 10, 2023 4:09 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Cindy Chiek
20222 Dayton St
Riverside, CA 92508

Letter I-904

Cindy Chiek
March 10, 2023

I-904.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Cindy <clchiek@gmail.com>
Sent: Friday, March 10, 2023 4:10 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Cindy Chiek
20222 Dayton St
Riverside, CA 92508

Letter I-905

Cindy Chiek
March 10, 2023

I-905.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Cindy <clchiek@gmail.com>
Sent: Friday, March 10, 2023 4:11 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Cindy Chiek
20222 Dayton St
Riverside, CA 92508

Letter I-906

Cindy Chiek
March 10, 2023

I-906.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Cindy <clchiek@gmail.com>
Sent: Friday, March 10, 2023 4:12 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Cindy Chiek
20222 Dayton St
Riverside, CA 92508

Letter I-907

Cindy Chiek
March 10, 2023

I-907.1 This comment letter is Form Letter G – Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Cindy <clchiek@gmail.com>
Sent: Friday, March 10, 2023 5:00 PM
To: Dan Fairbanks
Cc: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; jperry@riversideca.gov; Dr. Grace Martin; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

Thank you for allowing me to provide comments on this project.

Sincerely,
Cindy Chiek
20222 Dayton St
Riverside, CA 93508

Letter I-908

Cindy Chiek
March 10, 2023

I-908.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Collette Lee <colletteleesells@gmail.com>
Sent: Friday, March 10, 2023 12:52 PM
To: Dan Fairbanks
Subject: Opposition to warehouse expansion

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Collete Lee
Small Business Owner
8087 Citricado
Riverside. Ca 92508

Letter I-909

Collete Lee
March 10, 2023

I-909.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Carlos LLiguin <malinalli_1997@yahoo.com>
Sent: Friday, March 10, 2023 9:08 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

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· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Carlos Lliguin

Letter I-910

Carlos Lliguin
March 10, 2023

I-910.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Chris Nielsen <phidelt223@gmail.com>
Sent: Friday, March 10, 2023 3:42 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Christopher Nielsen
19941 Paso Robles Drive
Riverside CA 92508
Phidelt223@gmail.com

Letter I-911

Christopher Nielsen
March 10, 2023

I-911.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Chris Nielsen <phidelt223@gmail.com>
Sent: Friday, March 10, 2023 3:57 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

I am sure you are being bombarded with emails in opposition of this matter. However, this is something that I feel you should hear. I did speak about this in a public comment before but I want to share it with you in writing. I own a rental in the Box Springs area of Moreno Valley. I rent it out to single parents room by room, as I know the rental market for many is out of reach right now. Two of those single parents renting now are Amazon employees. They are barely making ends meet. To live in Orangecrest, or even Box Springs on the salaries these jobs would bring is unrealistic. This means the jobs would not go to locals. That means more traffic, trucks plus commuters. More congestion, more pollution, and more small locally owned businesses competing with yet another employer. Please drive up and down Van Buren from 215 to 91 and survey how many small businesses are hiring. This project is bringing "jobs" that this community doesn't want or need, and is not currently asking for. It would be bringing pollution (noise and air) from both trucks and commuters that we absolutely don't want.

I-912.1

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

I-912.2

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age

16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

I-912.2 Cont.

Sincerely,

Christopher Nielsen
19941 Paso Robles Dr
Riverside CA 92508
Phidelt223@gmail.com

Letter I-912

Christopher Nielsen
March 10, 2023

I-912.1 This comment speaks of personal experience related to rental property and asserts that jobs will not be filled by local residents. In response to concerns about jobs, employment, and available housing, please see Topical Response 5 – Jobs. The comment also expresses general concerns about environmental issues but does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-912.2 This comment is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Chris Nielsen <phidelt223@gmail.com>
Sent: Friday, March 10, 2023 3:59 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; Supervisor Jeffries - 1st District; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.
Sincerely,

Christopher Nielsen
19941 Paso Robles Dr
Riverside CA 92508
Phidelt223@gmail.com

Letter I-913

Christopher Nielsen
March 10, 2023

I-913.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Clarissa Rodriguez <crodr087@ucr.edu>
Sent: Friday, March 10, 2023 10:21 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: EIR COMMENT.pdf

Mr. Dan Fairbanks,

Please see attached my comment letter on the EIR for the e West Campus Upper Plateau Project.Thank you for allowing me to voice my concerns about this proposed project. I-914.1

Best,

Clarissa

--

Clarissa Rodriguez
Ph.D. Candidate, Larios Lab
Dept. of Botany & Plant Sciences
University of California, Riverside
https://www.clarissaroddecology.com/

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). Input from the community is essential, as we are the ones who will be experiencing the direct effects of this proposed project. The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas,; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. Additionally, I am a PhD student at UC Riverside who actively conducts research on the landscape vegetation in the vicinity of the proposed project. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat that my research is actively trying to find ways to restore critical habitat for many threatened, rare or endangered species. I ask that you require the project applicant to make *every effort* to preserve endangered and threatened species and plant life that you can.

I-914.2

Wildlife
The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year's timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. **Please redo studies that are more than a year old, as our wildlife and vegetation communities are rapidly changing due to climate change and anthropogenic impacts.**

Plant life

Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year when this plant would not be present? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I-914.2
Cont.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project. I greatly appreciate the opportunity for my voice to be heard on this important community matter.

Sincerely,
Clarissa Rodriguez

Clarissa Rodriguez
1201 W. Blaine ST, PT 66,
Riverside, CA
92507

crodr087@ucr.edu

Letter I-914

Clarissa Rodriguez
March 10, 2023

I-914.1 This comment is introductory and refers to an attached letter. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-914.2 This comment letter is a modified version of Form Letter C – Biological Resources with the following: "Input from the community is essential, as we are the ones who will be experiencing the direct effects of this proposed project."; "Additionally, I am a PhD student at UC Riverside who actively conducts research on the landscape vegetation in the vicinity of the proposed project."; "Please redo studies that are more than a year old, as our wildlife and vegetation communities are rapidly changing due to climate change and anthropogenic impacts."; "Why did you conduct the plant survey during a drought year when this plant would not be present?"; and "I greatly appreciate the opportunity for my voice to be heard on this important community matter." The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter C Response.

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From: Caro The Ultimate Swag <hairypugger0731@gmail.com>
Sent: Friday, March 10, 2023 2:21 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by our community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Carolina R
Orangecrest, 92508

Letter I-915

Carolina R
March 10, 2023

I-915.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: drose3@charter.net
Sent: Friday, March 10, 2023 11:53 PM
To: Dan Fairbanks
Subject: Response to West Campus Upper Plateau Project Environmental Impact Report (State Clearinghouse No. 2021110304)

Mr. Fairbanks:

As an owner of properties in the immediate shadow of the proposed West Campus Upper Plateau project ("Project"), please allow this email correspondence to serve as my official response to Environmental Impact Report (State Clearinghouse No. 2021110304) ("EIR"). I-916.1

In my opinion, the Project lacks sufficient environmental analysis and land use planning logic for a wide variety of reasons.

The proposed Project's ability to be developed hypothetically lies in March Air Force Base Joint Powers Authority's ("JPA") March Air Force Base Final Reuse Plan adopted in October 1996 ("Reuse Plan").

However, the proposed Project is inconsistent with the Reuse Plan (which the Master Environmental Impact Report for the General Plan of the March Joint Powers Authority, dated September 1999, states that "this element (Land Use Element) is based upon the March Air Force Base Reuse Plan preferred land use pattern) in many ways, including but not limited to the following: I-916.2

1) Under Section II, Reuse Planning Process, subsection A, Planning Phases, , subsection 1, Phase 1 paragraph two (2) of the Reuse Plan states that "alternative land use plans for the reuse lands which 1) are logically and reasonable based upon available information", Page II-7). The proposed Project's million plus square feet of industrial warehouse uses is absolutely NOT logical and reasonable as they are surrounded on three (3) sides by the neighboring residential communities of Orangecrest and Mission Grove in the City of Riverside.; I-916.3

2) Under Section II, Reuse Planning Process, subsection A, Planning Phases, subsection 1, Phase 1 paragraph two (2) of the Reuse Plan states that "and 3) include a "Community Preferred" pattern, which reflects the ultimate reuse goals of the neighboring communities", Page II-7). The proposed Project's million plus square feet of industrial warehouse uses is absolutely NOT what the neighboring residential communities of Orangecrest and Mission Grove in the City of Riverside.; I-916.4

3) Under Section II, Reuse Planning Process, subsection C, Planning Process Used, subsection 1, point b "Preferred reuses will be compatible with existing or General Plan land uses in areas adjacent to the base", Page II-11. The proposed Project is defnitely NOT compatible with the immediately adjacent and existing and City of Riverside General Plan designated residential communities of Orangecrest and Mission Grove in the City of Riverside.; I-916.5

4) Under Section II, Reuse Planning Process, subsection C, Planning Process Used, subsection 1, point f. "Serious and careful consideration will be given to the wishes of existing land use users and owners in areas adjacent to the base", Page II-11. The proposed Project's million plus square foot industrial warehouse uses has definitely not taken serious and/or careful considerations from the immediately adjacent and existing residential communities of Orangecrest and Mission Grove in the City of Riverside.; I-916.6

5) Under Section III, Goals and Policies, JPC Goals, subsection A, Community Interests, subsection 1, point a. "Protect the interests and existing commitments to adjacent residents, property owners and local jurisdictions in planning new land I-916.7

uses", Page II-15, The proposed Project's million plus square feet of industrial warehouse uses definitely do NOT protect the interests of the immediately adjacent and existing residential communities of Orangecrest and Mission Grove in the City of Riverside.; I-916.7 Cont.

6) Under Section III, Goals and Policies, JPC Goals, subsection A, Planning, subsection 9, point c, Strategy "Maximize the potential for aviation related land uses", Page II-18. The proposed Project's million plus square feet of industrial warehouse uses do NOT maximize the potential for aviation related land uses, as they're proposed for cold storage and other non-aviation related uses. I-916.8

7) Under Section III, Goals and Policies, JPC Policy Direction, subsection B, point 2. "Emphasize job-creating land uses which provide a wide range of job types and opportunities", Page II-19. The proposed Project's million square feet of industrial warehouse uses definitely do NOT provide a wide range of job types NOR opportunities. I-916.9

8) Under Section III, Goals and Policies, JPC Policy Direction, subsection B, point 4. "....ensure compatibility among adjoining uses", Page II-21. The proposed Project's million plus square feet of industrial warehouse uses definitely are NOT compatible with the immediately adjacent and existing residential communities of Orangecrest and Mission Grove in the City of Riverside.; I-916.10

9) Under Section IV, Planning Considerations, subsection A, Principal Considerations, subsection 3, Land Use, subsection b. Compatibility with Adjacent Land Uses..none of the four (4) land use alternatives proposed ANY industrial warehouse uses in the Upper Plateau area.; I-916.11

10) Exhibit 4, Constraints Map, Page II-28 shows the entire Upper Plateau area as Stephens Kangaroo Rat Management area, and with the proposed Project's development area as Stephen's Kangaroo Rat Open Space.; I-916.12

11) Exhbit 7, Conceptual Circulation Map, Page II-36, shows absolutely zero (0) roads going through the Upper Plateau area.; I-916.13

12) Exhibit "A", Preferred Land Use Plan, Page II-38, shows the majority of the Upper Plateau's developable area as Open Space.; I-916.14

13) Under Section V, Preferred Land Use Pattern and Alternatives, subsection A, Description of Alternative Land Use Patterns, subsection 1, Preferred Land Use Pattern "Westerly of this area, the pattern shows business park uses surrounding the Orangecrest community of Riverside", Page II-40.. The proposed Project's million plus lsquare feet of industrial warehouse is definitely NOT contemplated. I-916.15

14) Under Section V, Preferred Land Use Pattern and Alternatives, subsection A, Description of Alternative Land Use Patterns, subsection 1, Preferred Land Use Pattern "Efforts should be taken to land use compatibilities with the existing and planned residential areas adjacent to the base, including Orangecrest....",Page II-40. The proposed Project's million plus square feet of industrial warehouse uses are definitely NOT compatible with the existing residential community of Orangecrest in the City of Riverside.; I-916.16

15) Exhibit "B", Alternative Pattern, Page II-42, shows the majority of the Upper Plateau's developable area as Open Space.; I-916.17

16) Exhibit "C", SKR Partially Constrained Pattern, Page II-43, shows the entire Upper Plateau area as Stephen's Kangaroo Rat Management.; I-916.18

17) Exhibit"D", SKR Fully Constrained Pattern, Page II-44, shows the entire Upper Plateau area as Stephen's Kangaroo Rat Management and/or Open Space.; I-916.19

Additionally, the proposed Project is inconsistent with the General Plan ("General Plan") and the Master Environmental Impact Report for the General Plan of the March Joint Powers Authority, dated September 1999 ("General Plan MEIR"), in many ways, including but not limited to the following:

1) Section 3.1, Land Use Planning "The proposed Land Use Plan has been designed to prevent adverse impacts on land use, by proposing complementary land use designations, and land use intensities that are consistent with the subregion", Page I-9. The proposed Project's million plus square foot industrial warehouse uses are definitely NOT complementary land uses with the existing residential community of Orangecrest in the City of Riverside; I-916.20

2) Section 2, Project Description, subsection 2.2, Proposed General Plan, Land Use Element - This element is based upon the March AFB Master Reuse Plan preferred land use pattern. As stated above on multiple occasions, the proposed Project is definitely NOT compatible with the Reuse Plan. I-916.21

3) TABLE MEIR 2-2 RELATIONSHIP OF MARCH JPA GENERAL PLAN TO STATE-MANDATED ELEMENTS, "Based upon reuse plan preferred pattern of federally prepared master reuse plan", Page 2-10. As stated above on multiple occasions, the proposed Project is definitely NOT compatible with the Reuse Plan. I-916.22

4) Land Use Element GOAL 1: "Land Use Plan provides for a balanced mix of land uses that contribute to the regional setting, and capitalize on the assets of the Planning Area, while insuring compatibility throughout the Planning Area and with regional plans", Page 2-10. As stated above on multiple occasions, the proposed Project's million plus square foot of industrial warehouse uses are definitely NOT compatible with the existing residential community of Orangecrest in the City of Riverside.; I-916.23

5) Land Use Element GOAL 2: "Locate land uses to minimize land use conflict or creating competing land uses, and achieve maximum land use compatibility while improving or maintaining the desired integrity of the Planning Area and subregion", Page 2-10. As stated above on multiple occasions, the proposed Project's million plus square feet of industrial warehouse uses conflict with the existing residential community of Orangecrest in the City of Riverside.; I-916.24

6) Section 3, Environmental Impact Analysis, Significance Conclusion states "The proposed Land Use Plan has been designed to prevent adverse impacts on land use by proposing complementary land use designations, and land use intensities that are consistent with the subregion", Page 3-12. As stated above on multiple occasions, the proposed Project's million plus square feet of industrial warehouse uses are not complementary and/or consistent with adjacent residential uses, specifically, the existing residential community of Orangecrest in the City of Riverside.; I-916.25

The Developer appears to be basing all of its justifications for the proposed Project's development and imagined lack of impact(s) on a settlement agreement between and among the Center for Biological Diversity (CBD), the San Bernardino Valley Audubon Society, MJPA, and LNR Riverside LLC as the complete settlement of the claims and actions raised in Center for Biological Diversity v. Jim Bartel, et al. (CBD Settlement Agreement, MJPA 2012) ("Settlement Agreement"), although the Settlement Agreement was not contemplated as a project under CEQA nor had any and/or additional environmental analysis done for its part nor resulted in ANY changes/updates to the Reuse Plan nor resulted in any changes/updates to the General Plan nor resulted in any changes/updates to the General Plan MEIR. I-916.26

As such, based upon the above, and as it is completely incompatible with the existing residential community of Orangecrest in the City of Riverside, it is my position, that the Project can NOT proceed as proposed with among other things, the extension of Barton Road between Alessandro and Grove Community, and the provision for the million plus square foot industrial warehouse uses, etc.

If I can be of any further assistance, please feel free to contact me via either email and/or my phone at (951) 323-4543. I-916.27

Please advise.

Thank you.
David A. Rose III

Letter I-916

David A. Rose III
March 10, 2023

I-916.1 This comment is introductory in nature and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-916.2 This comment asserts that the land use document governing the development of the Project is the Final Reuse Plan. The comment further asserts that the Project is inconsistent with the Final Reuse Plan. The March JPA General Plan contains the land use regulations applicable to the Project site. The General Plan implements the Final Reuse Plan. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the role and purpose of the Master Reuse Plan.

I-916.3 This comment asserts that the Project is inconsistent with the Final Reuse Plan with regard to alternative land use plans for the reuse lands. The March JPA General Plan contains the land use regulations applicable to the Project site. The General Plan implements the Final Reuse Plan. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the role and purpose of the Master Reuse Plan.

I-916.4 This comment asserts that the Project is inconsistent with the Final Reuse Plan with reference to the reuse goals of the neighboring communities. The March JPA General Plan contains the land use regulations applicable to the Project site. The General Plan implements the Final Reuse Plan. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the role and purpose of the Master Reuse Plan.

I-916.5 This comment refers to Planning Process C1b of the Final Reuse Plan with reference to compatibility with existing or General Plan land uses in areas adjacent to the base. March JPA used Planning Process C1b to develop the Preferred Land Use Plan outlined in the Final Reuse Plan. The March JPA General Plan was then developed based on that Preferred Land Use Plan. The March JPA General Plan implements the Final Reuse Plan and designates the Project site as Business Park, Industrial, and Park/Recreation/Open Space. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution are expressly identified as a allowed uses within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. Additionally, under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations. The Conservation Easement would provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.

Further, as detailed in Recirculated Section 4.10, Land Use and Planning, the Project is consistent with the Good Neighbor Guidelines for the County of Riverside, and as discussed in Topical Response 4 – Project Consistency, the Project is consistent with the City of Riverside Good Neighbor Guidelines. The purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and

health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. The Project is compatible with the surrounding land uses.

I-916.6 This comment refers to Planning Process C1f of the Final Reuse Plan with specific reference to consideration of the wishes of existing land use users and owners in areas adjacent to the base. March JPA used Planning Process C1f to develop the Preferred Land Use Plan outlined in the Final Reuse Plan. The March JPA General Plan was then developed based on that Preferred Land Use Plan. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the role and purpose of the Master Reuse Plan.

I-916.7 This comment asserts that the Project is inconsistent with the Final Reuse Plan goals to protect the interests and existing commitments to adjacent residents, property owners and local jurisdictions in planning new land uses. The March JPA General Plan contains the land use regulations applicable to the Project site. The General Plan implements the Final Reuse Plan. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the role and purpose of the Master Reuse Plan.

I-916.8 This comment asserts that the Project is inconsistent with the Final Reuse Plan goals with regard to maximizing the potential for aviation-related land uses. The March JPA General Plan contains the land use regulations applicable to the Project site. The General Plan implements the Final Reuse Plan. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the role and purpose of the Master Reuse Plan.

I-916.9 This comment asserts that the Project is inconsistent with the Final Reuse Plan policy direction to emphasize job-creating land uses. The March JPA General Plan contains the land use regulations applicable to the Project site. The General Plan implements the Final Reuse Plan. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the role and purpose of the Master Reuse Plan.

I-916.10 This comment questions the Project's compatibility with surrounding uses with reference to policy direction under the Final Reuse Plan. Please see Response I-916.5, above.

I-916.11 This comment asserts that the Project is inconsistent with the Final Reuse Plan's land use alternatives. The March JPA General Plan contains the land use regulations applicable to the Project site. The General Plan implements the Final Reuse Plan. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the role and purpose of the Master Reuse Plan.

I-916.12 This comment refers to the Constraints Map included as Exhibit 4 to the Final Reuse Plan that shows Stephen's Kangaroo Rat (SKR) Open Space on the Project site. As noted above, the March JPA General Plan governs the land uses at the Project site. As discussed in Recirculated Section 4.10, Land Use and Planning, since the development of the March JPA General Plan in 1999, the Project site has been designated for development. Although Exhibit 5-1 of the March JPA General Plan identifies the former Weapons Storage Area as SKR Open Space and the remainder of the Project site as SKR Management Area, the March JPA General Plan states that "the lands currently designated for SKR management and open space purposes will be available for development."

Figure 1-4, Land Use Plan, of the March JPA General Plan designates the former Weapons Storage Area as Park/Recreation/Open Space and the remainder of the Project site as Business Park. The swap of March JPA lands, including the Project site, for more and better quality SKR habitat was the subject of the 2012 Settlement Agreement with the Center for Biological Diversity and San Bernardino Valley Audubon Society (Appendix S). Under the CBD Settlement Agreement, the land uses were inverted, with the Weapons Storage Area identified for development, along with a 60-acre park, and the remainder of the Project site identified as a conservation easement (see Figure 3-4 of the Draft EIR).

I-916.13 This comment refers to a Conceptual Circulation Map included in the Final Reuse Plan and notes that it does not show any roads going through the Project site. As noted above, the March JPA General Plan governs the land uses at the Project site. Since the development of the March JPA General Plan in 1999, the Project site has been designated for development. As detailed in Section 3.5.6, Requested Approvals and Entitlements, the Project requests the approval of General Plan Amendment 21-01, which would include a modification to Exhibit 2-1, Transportation Plan, and Exhibit 2-3, Transportation Road Systems, of the General Plan, to allow for road connection and circulation changes. March JPA General Plan Exhibit 2-1 (Transportation Plan) does identify a circulation system serving future development within the West Campus Upper Plateau area, which is not significantly different than that proposed by the Project. One difference is that the Project further adds Barton Street, a planned collector street on the City of Riverside General Plan Mobility Plan, at the request of the City of Riverside.

I-916.14 This comment refers to the Preferred Land Use Plan included in the Final Reuse Plan that shows Open Space on the Project site. As noted above, the March JPA General Plan governs the land uses at the Project site and was developed based on the Preferred Land Use Plan. See responses I-916.5 and I-196.12 above for further discussion of the land uses at the Project site.

I-916.15 This comment refers to the Preferred Land Use Pattern included in the Final Reuse Plan and notes that it shows business park uses surrounding the Orangecrest community. As noted above, the March JPA General Plan governs the land uses at the Project site and was developed based on the Preferred Land Use Plan. See responses I-916.5 and I-196.12 above for further discussion of the land uses at the Project site.

I-916.16 This comment refers to the Preferred Land Use Pattern included in the Final Reuse Plan. As noted above, the March JPA General Plan governs the land uses at the Project site and was developed based on the Preferred Land Use Plan. See response I-916.5 above for further discussion of the land uses at the Project site.

I-916.17 This comment refers to an alternative land use pattern included in the Final Reuse Plan. This alternative was not selected by the Final Reuse Plan; the Preferred Land Use Pattern was. As noted above, the March JPA General Plan governs the land uses at the Project site and was developed based on the Preferred Land Use Plan in the Final Reuse Plan.

I-916.18 This comment refers to an alternative land use pattern included in the Final Reuse Plan. This alternative was not selected by the Final Reuse Plan; the Preferred Land Use Pattern was. As noted above, the March JPA General Plan governs the land uses at the Project site and was developed based on the Preferred Land Use Plan in the Final Reuse Plan.

I-916.19 This comment refers to an alternative land use pattern included in the Final Reuse Plan. This alternative was not selected by the Final Reuse Plan; the Preferred Land Use Pattern was. As noted above, the March JPA General Plan governs the land uses at the Project site and was developed based on the Preferred Land Use Plan in the Final Reuse Plan.

I-916.20 This comment asserts that the Project is inconsistent with Section 3.1, Land Use and Planning, of the March JPA General Plan. Please refer to Recirculated Section 4.10, Land Use and Planning, and Response I-916.5 above for further discussion of the Project's consistency with the March JPA General Plan.

I-916.21 This comment refers to a statement in the March JPA General Plan that indicates that the land use element thereof is based upon the March AFB Master Reuse Plan preferred land use pattern. The comment further asserts that the Project is inconsistent with the Final Reuse Plan. As noted above, the March JPA General Plan was developed based on the Preferred Land Use Plan in the Final Reuse Plan and the March JPA General Plan governs the land uses at the Project site. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the interplay between the Final Reuse Plan and the March JPA General Plan.

I-916.22 This comment refers to a table in the General Plan EIR that again refers to the Master Reuse Plan preferred land use pattern. The comment further asserts that the Project is inconsistent with the Final Reuse Plan. As noted above, the March JPA General Plan was developed based on the Preferred Land Use Plan in the Final Reuse Plan and the March JPA General Plan governs the land uses at the Project site. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the interplay between the Final Reuse Plan and the March JPA General Plan.

I-916.23 This comment asserts that the Project is inconsistent with Land Use Element Goal 1 of the General Plan. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the Project's consistency with the March JPA General Plan.

I-916.24 This comment asserts that the Project is inconsistent with Land Use Element Goal 2 of the General Plan. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the Project's consistency with the March JPA General Plan.

I-916.25 This comment refers to the General Plan EIR impact analysis and again asserts that the Project is inconsistent with the General Plan. Please see Recirculated Section 4.10, Land Use and Planning, and Response I-916.5 above for a discussion of the Project's land uses and consistency with the March JPA General Plan.

I-916.26 This comment asserts without evidence or rationale that the Project "appears to be basing all of its justifications for the proposed Project's development" on the CBD Settlement Agreement discussed in the Draft EIR. The CBD Settlement Agreement informed the development of the Project site plan. The Draft EIR has undertaken the required environmental analysis.

I-916.27 This comment asserts that the Project is incompatible with the existing residential uses. Please see Recirculated Section 4.10, Land Use and Planning, and Response I-916.5 above, for a discussion of the Project's land uses and consistency with the March JPA General Plan.

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Letter I-917

[NOT USED]

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From: Debbie Walsh <abilene149@gmail.com>
Sent: Friday, March 10, 2023 4:56 PM
To: Dan Fairbanks; district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: upperplateauProject.pdf

Mr. Fairbanks,

Please submit my letter for comments for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304. I-918.1

Please submit to the administrative record.

See attached.

Debbie Walsh
951-317-6868
abilene149@gmail.com

Rural Association of Mead Valley
PO Box 2244
Perris, CA 92572
abilene149@gmail.com

March JPA

RE: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

On behalf of concerned area residents and the Rural Association of Mead Valley, please accept these comments regarding the EIR for the West Campus Upper Plateau Project.

The EIR for this Project has numerous areas of concern. The Geo report Appendix G is completely deficient. The entire Geo report contains one paragraph on pages 7-8 that even mentions the Munitions Depot that March Air Base has used for decades. This munitions site is located on the Project.

The following statements in Appendix G.

> The majority of the site is currently occupied by the former March Air Force Base ordnance area. This ordnance area is surrounded by approximately 10-foot high barbed-wire-topped chain link fencing, and makes up approximately 70% of the overall Site. The remainder of the Site is vacant and undeveloped land. The ordnance area contains 14 single-story, concrete ordnance storage bunkers (circa 1940's and 1950's), and seven other associated single-story buildings (circa late 1950's to mid 1960's) in various states of abandonment. Numerous asphalt paved roads, as well as some dirt roads, exist within the ordnance area, and connect these various structures/bunkers. The facilities on-site are no longer in use by the military. A tenant is currently using the bunkers as storage for pyrotechnics.

The report states the site contains munition bunkers that are not abandoned. The report continues to state that munitions bunkers are used for the storage of fireworks. There is no information provided in regard to location, type, quantity, safety and who is in charge of the fireworks located on site.

Are the bunkers abandoned or not? Are all of the bunkers used for pyrotechnics?
Are the bunkers currently used for storage of bombs?

I-918.2

"Based on the review of the provided preliminary grading plans, site grading is expected to have cuts of up to approximately 50 feet deep and fills of up to approximately 55 feet thick, plus remedial grading, where applicable" (Page 2).

I-918.3

The site is currently being used to detonate bombs. These bombs can be felt and heard for miles away. One of those bombs was detonated this week. There is no mention of the use of the site for current bomb detonation. No details as to testing for chemicals or black powder contained on the site from these exploded devises. This has been going on for years.

https://www.march.afrc.af.mil/About-Us/Fact-Sheets/Display/Article/167413/the-march-field-story/

> The story of March Field began at a time when the United States was rushing to build up its military forces in anticipation of an entry into World War I over 100 years ago.
> By late April 1918, March was a training facility.
> In 1931, March Field became an operational base. Before the end of the year, the 7th Bomb Group, commanded by Major Carl A. Spaatz, brought its Condor B-2 and Keystone B-4 bombers to the picturesque field. The activation of the 17th Pursuit Group and several subordinate units along with the arrival of the 1st Bombardment Wing initiated a period where March Field became associated with the Air Corps' heaviest aircraft as well as an assortment of fighters.
>
> From 1949 to 1953, the B-29 Super fortresses dominated the flightline at March Air Force Base. For four months, July to October, the 22d saw action over Korea and in this brief period, contributed to the elimination of all strategic enemy targets. Involvement in the Korean Conflict had no sooner ended when the wing converted from the huge propeller-driven B-29s to the sleek B-47 jet bombers and their supporting tankers.
>
> By September 16, 1963, brought March its first B-52B bomber, "The City of Riverside." Soon 15 more of the giant bombers appeared on the flightline along with new KC-135 jet "Stratotankers." March's first KC-135, "The Mission Bell," arrived on October 4, 1963. For the next twenty years this venerable team would dominate the skies over what had come to be called the Inland Empire as the 22d Bombardment Wing played a feature role in the Strategic Air Command's mission. During this period, both tankers and bombers stood alert at March as part of America's nuclear deterrent force.

I-918.4

"Originally known as March Field, the base dates to World War I and served as a bomber crew training ground in World War II and a B-52 bomber base during the Cold War. Today, KC-135 tankers, C-17 cargo planes, F-15 and F-16 fighter jets and MQ-9 drones fly out of March" (https://oldcc.gov/march-air-force-bases-downsizing-created-ghost-town-heres-whats-there-now).

The B-52B's maximum bomb load was 43,000 pounds (19,505 kilograms). It could carry a maximum of 27 1,000-pound conventional explosive bombs. For strategic missions, the bomber carried one Mark 6 nuclear bomb, which had a yield ranging from 8 to 160 kilotons, depending

on Mod, or two Mark 21 thermonuclear bombs, each with a yield of 4–5 megatons. (https://www.thisdayinaviation.com/tag/march-air-force-base/)

I-918.4 Cont.

EPA Federal Facilities Forum Issue Paper:
SITE CHARACTERIZATION FOR MUNITIONS CONSTITUENTS
https://www.epa.gov/sites/default/files/documents/site_characterization_for_munitions_constituents.pdf

EPA Munitions Policy and Guidance.
Explosive soil. Explosive soil refers to any mixture of explosives in soil, sand, clay, or other solid media at concentrations such that the mixture itself is reactive or ignitable. The concentration of a particular explosive in soil necessary to present an explosion hazard depends on whether the explosive is classified as "primary" or "secondary." Guidance on whether an explosive is classified as "primary" or "secondary" can be obtained from Chapters 7 and 8 of TM 9-1300-214, Military Explosives. (Pg. ix).

Military munitions. All ammunition products and components produced for or used by the armed forces for national defense and security, including ammunition products or components under the control of the Department of Defense, the Coast Guard, the Department of Energy, and the National Guard. The term includes confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, chemical munitions, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, and devices and components thereof.

I-918.5

The term does not include wholly inert items, improvised explosive devices, and nuclear weapons, nuclear devices, and nuclear components, other than non-nuclear components of nuclear devices that are managed under the nuclear weapons program of the Department of Energy after all required sanitization operations under the Atomic Energy Act of 1954 (42 U.S.C. 2011 et seq.) have been completed (10 U.S.C. 101 (e)(4).[10] (pages xi, x).

Military Munitions has not been sufficiently analyzed in the EIR. This site has been used for chemical storage, nuclear weapons storage and explosive munitions for over 100 years. Hazardous waste at the Project site has not been adequately analyzed. A lot has happened during the past 100 years. There was two World Wars and a Cold War. How deep are these chemicals, explosives and/or their components in the ground? Did some of this leach into the soil? The grading for this project is 55 feet deep.

Table 2-1. NOP Comments

Commenter	Date	Comments
Riverside County Airport Land Use Commission	11/23/2021	• The Project site is located within Zones B1, B2, C1, and C2 of the March AIA, and review by ALUC is required • Need to complete Application for Major Land Use Action Review
South Coast Air Quality Management District	12/07/2021	• Construction and operational air quality analysis needed • Consider performing a mobile source health risk assessment • Incorporate mitigation measures as necessary
City of Riverside, Community Development Department	12/20/2021	• Mixed use areas should have direct access to Barton Drive • Barton Drive and Cactus Avenue should not intersect • Consider a potential future City of Riverside police station on the Project site • The Traffic Engineering Division would like to review the Project's Traffic Impact Analysis Study • Consider including trails in recreational and open space areas • Indicate when the 10-acre park would be developed • Request for a Fire Fuel Management Plan
United States Air Force	12/20/2021	• Former landfill area will remain undeveloped by the Project • An unexploded ordinance (UXO) survey and clearance should be conducted

I-918.6

Fireworks are being stored at the Project site.
https://www.upi.com/Archives/1996/09/06/Fireworks-explosion-kills-one/6841841982400/

Fireworks explosion kills one.

https://www.sandiegouniontribune.com/sdut-fireworks-company-has-had-prior-accidents-2010jul11-story.html

This Fireworks Company has had prior accidents.

This is a safety concern that residents living nearby are being exposed to dangerous fireworks in the bunkers near their church, schools and homes. What safety measures will be in place to safely remove tons of fireworks from the community?

I-918.7

The explosion at the Rialto facility could be felt at my house in Perris. It felt like a big earthquake. A fireworks explosion that close to hundreds of homes poses a huge safety risk.

Existing development within the Project site consists of a non-operational water tower, an existing Eastern Municipal Water District (EMWD) water tank, paved and dirt access roads, and 16 bunkers and related structures that were previously used for munitions storage by the Air Force prior to March AFB's realignment in 1993. All of the bunkers are currently used by Pyro Spectaculars Inc. for the storage of fireworks. While the Specific Plan Area primarily encompasses existing development and previously disturbed land, the Conservation Easement primarily consists of open space and undeveloped land. (EIR Page 3-1)

"The closest schools to the Project site, Benjamin Franklin Elementary School and Amelia

I-918.8

Earhart Middle School, are located south of the Project site in the Orangecrest neighborhood. The Benjamin Franklin Elementary School is located approximately 3,064 feet south of the Specific Plan Area and the Amelia Earhart Middle School is located approximately 3,315 feet south of the Project site. Additionally, Grove Community Church Preschool is located on the Grove Community Church campus, which is approximately one-quarter mile south of the Specific Plan Area" (EIR 3-1).

This is not accurate as the Grove Church and school measure less than 625 feet to 732 feet from the Project Buildings. The Project is across Barton Street from the Project. The trucks, with their noise and harmful pollution, will be using Barton Street directly next to the church and school. This has not been analyzed in the EIR.

The Grove Church and School are very close to the Project. Barton Ave. borders the church on the east. Hundreds of trucks and vehicles will use Barton south through the Orangecrest Community and past the Community Park to Orange Terrace Parkway and past an Elementary School to Trautwein. The trucks will travel through the heart of the community. Trucks will use Van Buren to the 91 Freeway or use Wood to Cajalco to the I-15 to get to their destinations.

"The closest schools to the Project site, Benjamin Franklin Elementary School and Amelia Earhart Middle School, are located south of the Project site in the Orangecrest neighborhood.



I-918.8 Cont.



Truck Routes

Trucks from this Project will be going through the Communities of Orangecrest, Woodcrest, Mead Valley and Lake Mathews. The trucks will travel directly next to the Orangecrest Community Park. The truck routes are not included in the EIR for analysis. Numerous schools are along these routes. Homes (sensitive receptors) are 415 feet from warehouses along the north portion of the project site. Along the southern portion of the project site the distance is less than a 1000 foot buffer.

Brown Street will allow traffic from the warehouses to travel north on Brown Street entering more residential neighborhoods onto Alessandro.

I-918.9

The Project site should be left vacant considering the past and current use of the site as a munitions and fireworks storage facility.

Over the 100 years this site has been used by the Air Force for numerous types of uses where chemicals, munitions, hazardous waste and nuclear weapons have been used and stored.

I-918.10

The site must have a very thorough geological study performed. It is estimated that the grading will be over 55 feet in depth. The analysis of the soil must be that deep. Grading dirt that is contaminated and mixing with other soils contaminates all of the soil. Boring holes in numerous locations 50 feet deep must be performed to adequately analyze the current status

of the soil. Leaching from chemicals, black powder, and other hazardous materials on the site must be determined before the site can be declared safe.

Please choose the **"NO PROJECT ALTERNATIVE".** This Project site is not safe. It might never be safe.

The US Government in the past has a history of dumping tons of hazardous waste on Air Force, Army and Navy property. For over 100 years this Air Force base has had hazardous waste dumped on the land surrounding it. This site must have more than the minimum 5 foot boring test holes. The tests must be numerous and go down to a minimum of 55 feet. The soil must be completely analyzed.

A complete report must be made as to how, when and where the pyrotechnic fireworks will be addressed.

I-918.10 Cont.

Sincerely,

Debbie Walsh

Letter I-918

Debbie Walsh
March 10, 2023

I-918.1 This comment is introductory and refers to an attached letter. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-918.2 This comment raises concern for the Project site's existing conditions, specifically related to munitions storage (i.e., ordnance) and existing operations as storage for fireworks. The comment suggests the Geotechnical Exploration (Appendix G-1) is not sufficient in establishing existing conditions on site. The comment further questions the location, type, quantity, and safety related to existing conditions. The Draft EIR explains that the site includes 14 bunkers that were previously used for munitions storage by the Air Force prior to the March AFB's realignment in 1993. The usage of the bunkers for fireworks by Pyro Spectaculars Inc. is expected to cease in 2024 and all removal activities will be conducted pursuant to all applicable regulatory requirements. As of that date, no fireworks or any other ordnance will be stored on the Project site. The Project does not involve or propose the storage of fireworks on the Project site.

I-918.3 This comment quotes the Geotechnical Exploration's review of preliminary grading plans. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-918.4 This comment asserts the Project site is used to detonate bombs and details the military history of the March AFB. The comment asserts the munitions have not been sufficiently analyzed in the EIR. Bombs are not currently being detonated at the Project site; the comment presents no evidence to the contrary. The Draft EIR discloses the site includes 14 bunkers that were previously used for munitions storage by the Air Force prior to the March AFB's realignment in 1993. With respect to the munitions stored in the WSA, please see Recirculated Section 4.8, Hazards and Hazardous Materials, which describes the potential hazards associated with the bunkers on site, as well as former uses by March AFB on site. Further, the quotes provided by the comment from the March Air Reserve Base website and the U.S. Department of Defense website detail the prior use of the March AFB as a base for bomber jets. The usage of the base by bomber jets, and even storage of the contents of those jets, does not provide evidence or suggest in any way that bombs are being detonated at the Project site, and does not in any way speak to the current use of the site.

I-918.5 This comment cites EPA policies regarding munitions and explosive soil and asserts that military munitions have not been sufficiently analyzed in the Draft EIR. The comment further questions whether "some of this" leeched into soil and the depth of any "chemicals, explosives and/or their components in the ground." As discussed above, and further addressed in Recirculated Section 4.8, Hazards and Hazardous Materials, the environmental status of the Project site has been fully characterized based on years of analysis under the oversight of multiple regulatory agencies, including the United States Environmental Protection Agency, the Department of Toxic Substances Control, and the Regional Water Quality Control Board, in addition to numerous studies prepared in connection with the Project itself, including a Phase I Environmental Site Assessment (ESA) and Phase II ESA. The Phase I ESA assessed whether soil or other additional testing was necessary to characterize the extent, if any, of

contamination on the Project site. The Phase II ESA sampling was conducted as a result of the recommendations in the Phase I ESA. The Phase II ESA found that all constituents of concern in soil samples collected during the Phase II ESA were below commercial/industrial screening levels. As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, additional research was conducted that confirms that all constituents of concern (COCs) in soil samples collected during the Phase II ESA are also below construction worker and residential screening levels. The Phase I determined the depths at which COCs could be encountered and the Phase II sampled to those depths. Given that all COCs in soil in the Phase II ESA are below the most conservative residential and construction worker standards, rather than only the required commercial/industrial standards, there is no indication that any COCs would be encountered below those depths, much less at 50 feet below ground surface. As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, the environmental soil sampling was completed "in the locations, and to the depths, judged appropriate based on the potential concern for the former Ordnance Storage Facility / Weapons Storage Area activities to have caused a potential impact to shallow soils. Historical research indicates these former activities occurred at the existing site grade. There is no indication of former activities /features likely to have caused a release (of the chemicals of concern for which analyses were completed) that originated well below the existing ground surface (such as deeply buried tanks or pipelines, etc.). Leighton completed various environmental soil sampling trenches to five feet deep below ground surface (bgs), as well as environmental sampling borings to approximately 25 to 30 feet bgs. … Given the known site conditions, and future planned site usage, the depth of environmental investigations were appropriate." As such, no further sampling or analysis is required. Please see Recirculated Section 4.8, Hazards and Hazardous Materials, for further discussion of the Project site's environmental characterization.

I-918.6 This comment is a copy of Table 2-1, NOP Comments, from the Draft EIR. The NOP comments were addressed in the preparation of the Draft EIR. The comment does not include any specific issues or concerns related to the adequacy of the environmental analysis included within the Draft EIR. As such, no further response is provided.

I-918.7 This comment notes the potential risks associated with firework explosions and includes references to instances in which the company that stores fireworks on site (Pyro Spectaculars Inc.) had prior accidents. The comment asks about the safety measures to remove these fireworks off site and is similar to Comment I-918.2. See Response I-918.2 for discussion on handling hazardous materials on site. As noted above in Response I-918.2, the usage of the bunkers for fireworks by Pyro Spectaculars Inc. is expected to cease in 2024 and all removal activities will be conducted pursuant to all applicable regulatory requirements. As of that date, no fireworks or any other ordnance will be stored on the Project site. The Project does not involve the storage of fireworks.

I-918.8 This comment asserts the preschool on the Grove Community Church campus is between 625 to 732 feet from the Project's proposed buildings. The Draft EIR recognizes that the existing Grove Community Church preschool is within one-quarter mile of the proposed Campus Development. MM-HAZ-2 (Materials Storage Near School) would prohibit facilities within a quarter mile from storing, handling, or using toxic or highly toxic gases at quantities that exceed threshold levels established by California Health and Safety Code 25532. Further, the comment states the Draft EIR did not analyze potential impacts related to truck traffic noise and associated pollution on Barton Street. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; trucks can only access the parcels within the

Campus Development via Cactus Avenue. Trucks associated with the Project will not have access to Barton Street.

I-918.9 This comment states the Project would result in truck traffic through the Orangecrest, Woodcrest, Mead Valley, and Lake Mathews residential communities, and that the Draft EIR did not include analysis on the potential impacts. This comment also asserts that the proposed truck routes are not included in the Draft EIR for analysis, which is incorrect. The truck routes for the Project can be found at Figure 3-6 of Recirculated Chapter 3, Project Description. As shown in Figure 3-6, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Under PDF-TRA-1, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, the truck routes will continue to be enforced by the relevant jurisdictions. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-918.10 This comment states the Project site should remain vacant based on past and current uses on site. The comment raises concern for hazardous materials on site and asserts additional analysis is required to assess soil contamination. Please see Recirculated Section 4.8, Hazards and Hazardous Materials, and Response I-918.5 above, regarding additional information about the extent of soil characterization as well as past uses and testing in the bunkers at the Project site.

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From: Eunhee Kim <eunster@yahoo.com>
Sent: Friday, March 10, 2023 6:32 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 202111030

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the

past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Eunhee Kim
Raleigh, NC 27615
eunster@yahoo.com

Letter I-919

Eunhee Kim
March 10, 2023

I-919.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Gayle Dicarlantonio <gayledmail@gmail.com>
Sent: Friday, March 10, 2023 5:43 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

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1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

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· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

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· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

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· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Gayle DiCarlantonio
Riverside 92507
gayledmail@gmail.com

Letter I-920

Gayle DiCarlantonio
March 10, 2023

I-920.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Greg Renne <gregrenne@hotmail.com>
Sent: Friday, March 10, 2023 12:34 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach
· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Greg Renne
20709 Stony Brook Circle
Riverside, CA 92508
gregrenne@hotmail.com

Letter I-921

Greg Renne
March 10, 2023

I-921.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: honeymbernas@gmail.com
Sent: Friday, March 10, 2023 11:37 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: EIR Comment Letters - Honey.pdf

Dear Mr. Fairbanks,

Please accept and enter the attached public comment letters into the record for the West Campus Upper Plateau Project EIR, State Clearinghouse No 2021110304. I-922.1

Sincerely,

Honey Bernas

March 9, 2023

Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: PUBLIC COMMENT FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project site consists of over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas. The proposed project is less than a quarter mile from a preschool, and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently and adamantly requested by the community.

This area consists of beautiful, pristine habitat which is home to many birds, reptiles, and animals. As an individual who spent her career protecting threatened and endangered species and their habitats, I have serious concerns about the shrinking of open spaces and destruction of habitat in the City and County of Riverside. I ask that you require the project applicant to make every effort to adequately survey for and preserve endangered and threatened species. Many City and County of Riverside residents consider open-space a treasured amenity.

I-922.2

<u>Wildlife</u>

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? It is my understanding that the final EIR should include wildlife studies from within a one-year timeframe to satisfy the requirements of the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why was the plant survey during a drought year? How can one say it is absent or assess the significance of impact unless its absence is documented during a year and season where the rare plant life would grow?

I-922.2 Cont.

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that rare plant life is not being destroyed unless a more thorough and meaningful survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing habitat mitigations? How can you ensure the public that these mitigation measures will be enforced? The conservation easement and management entity 10 years after the settlement should be formalized prior to any approvals being granted.

Thank you for allowing me the opportunity to provide comments on this project.

Sincerely,



Honey Bernas
19981 St. Francis Drive
Riverside, CA 92508
honeymbernas@gmail.com

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

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I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area. I-922.3

Specifically, I would like to ask:

1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?

5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis, including PFAS, PFOS, perchlorate, trichloroethylene, perchlorothylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

I-922.3 Cont.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health, and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to the issuance of demolition or grading permits. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be properly removed.

Thank you for allowing me to provide comments on this project.

Sincerely,



Honey Bernas
19981 St. Francis Drive
Riverside, CA 92508
honeymbernas@gmail.com

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

Dear Mr. Fairbanks:

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As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. **Why did each of the alternative plans include 143 acres of industrial zoning?** The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. **Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.**

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; **how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?**

I-922.4

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions**"** and **"**Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." **How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.**

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). **In what specific ways have you incorporated Community Preference in the development of your plan?**

I-922.4
Cont.

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

> "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
> b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
> d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was

never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process. I-922.4 Cont.

Thank you for allowing me the opportunity to comment on your project.

Sincerely,



Honey Bernas
19981 St. Francis Drive
Riverside, CA 92508
honeymbernas@gmail.com

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

Dear Mr. Fairbanks:

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

I-922.5

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the area, and the adjacent truck routes of Alessandro, Krameria, and Van

Buren into account. Anyone who lives here knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project.

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

I-922.5 Cont.

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,



Honey Bernas
19981 St. Francis Drive
Riverside, CA 92508
honeymbernas@gmail.com

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

Dear Mr. Fairbanks:

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The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

I-922.6

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1) Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2) Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I-922.6
Cont.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I grew up in an area surrounded by warehouses and truck traffic. Many residents and generations of residents suffered from lung issues, including asthma and COPD. There were many days the schools would prohibit us from having recess or participating in physical activity due to the air quality being harmful. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening date of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,



Honey Bernas
19981 St. Francis Drive. Riverside, CA 92508
honeymbernas@gmail.com

March 9, 2023

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The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

I-922.7

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

I-922.7 Cont.

Even if allowed for, your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Honey Bernas

Honey Bernas
19981 St. Francis Drive
Riverside, CA 92508
honeymbernas@gmail.com

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

I-922.8

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the “significant and unavoidable” noise impacts which you have identified will also negatively impact the daily lives of residents.

I-922.8
Cont.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics, quality of life, health, and decreased home values for the residents who will have to live with this development for decades to come.

I-922.8 Cont.

Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,



Honey Bernas
19981 St. Francis Drive
Riverside, CA 92508
honeymbernas@gmail.com

Letter I-922

Honey Bernas
March 10, 2023

I-922.1 This comment is introductory and refers to an attached letter. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-922.2 This comment is a modified version of Form Letter C – Biological Resources with the addition of the following: "This area consists of beautiful, pristine habitat which is home to many birds, reptiles, and animals. As an individual who spent her career protecting threatened and endangered species and their habitats,"; "Many City and County of Riverside residents consider open-space a treasured amenity." These modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter C Response.

The comment also states: "The conservation easement and management entity 10 years after the settlement should be formalized prior to any approvals being granted." The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity.

I-922.3 This comment is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

I-922.4 This comment is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

I-922.5 This comment is Form Letter G – Traffic with the addition of: "Children were late for school, parents were late for work, etc." and "not to mention the increased burden of road maintenance costs to the City and County." The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter G Response.

I-922.6 This comment is Form Letter B – Air Quality with the addition of: "I grew up in an area surrounded by warehouses and truck traffic. Many residents and generations of residents suffered from lung issues, including asthma and COPD. There were many days the schools would prohibit us from having recess or participating in physical activity due to the air quality being harmful." Recirculated Section 4.2, Air Quality and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts identified in the Draft EIR. In response to the remainder of this comment, please see Form Letter B Response.

I-922.7 This comment is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

I-922.8 This comment is Form Letter A – Aesthetics with the addition of "quality of life, health, and decreased home values for" in the last paragraph. The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter A Response.

From: Kyle Warsinski <kwarsinski@gmail.com>
Sent: Friday, March 10, 2023 10:00 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. I-923.1

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. As a professional in the development industry, we all know what the term "business park" means. It is borderline offensive that the applicant refers to 200,000 sq. ft., 50' tall building as a business park use. That is clearly a high-cube warehouse. I-923.2

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? Why wasn't an alternative design studied which lowered the building pad heights so that the top of each proposed building was no higher than the current topography in the area? As proposed the building pad is nearly level with the elevation of my backyard and pool which look over the property. Adding a 50' building to the proposed pad and the view of the mountains and city area eliminated. I-923.3 I-923.4

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. I-923.5

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

I-923.5 Cont.

Sincerely,

Kyle Warsinski
20180 Dayton Street
Riverside, CA 92508
kwarsinski@gmail.com

Letter I-923

Kyle Warsinski
March 10, 2023

I-923.1 This comment is the first two paragraphs of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-923.2 This comment questions the definition of "business park". Table 3-2, Land Uses by Land Use Designation, of Recirculated Chapter 3, Project Description, identifies uses allowed within the "business park" land use designation. The March JPA General Plan includes warehousing in the definition of Business Park uses. Moreover, wholesale, storage and distribution are expressly identified as allowed uses within the Business Park Zoning District, as identified in the March JPA Development Code. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-923.3 This comment is the same as the third paragraph of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-923.4 This comment requests the inclusion of an alternative that lowers building heights to be no higher than the current topography. CEQA Guidelines Section 15126.6(f) provides that "[t]he range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project." As examined in Section 4.1, Aesthetics, of the Draft EIR, Topical Response 1 – Aesthetics, and Form Letter A Response, the EIR has disclosed the Project's aesthetic impacts, applied an appropriate threshold of significance based on 2022 March JPA CEQA Guidelines, and determined the Project's impacts to be less than significant with implementation of PDF-AES-1 through PDF-AES-16 and MM-AES-1 through MM-AES-3. As such, the reduction of aesthetic impacts would not be required to be considered in the selection of a reasonable range of alternatives to the Project. The alternatives presented in Chapter 6, Alternatives, of the Draft EIR, have all been evaluated for potential aesthetic impacts. Similar to the analysis included in Section 4.1, Aesthetics, consideration of visual changes to publicly available views of the Project site were considered. Alternative 2 (Reduced Development) and Alternative 4 (Reduced Cultural Resource Impact) were determined to have reduced aesthetics impacts compared to the Project. Topical Response 8 – Alternatives, presents and analyzes a new Alternative 5 – Non-Industrial Alternative, determining its aesthetic impacts would be reduced compared to the Project's.

I-923.5 This comment is the same as the last for paragraphs of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: ljmallen@aol.com
Sent: Friday, March 10, 2023 4:26 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Subject: Alternate Plan Proposal/Public comment section 4.12 for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau and comments on the EIR, I have included the Commission on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

I-924.1

1. Alternate plan #1: The Campus Approach
· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational

opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County. Tesla just opened nearby and would probably be excited about contributing to this plan.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

I-924.1 Cont.

Also section 4.12 of the EIR Population and Housing fails to adequately analyze the the population and housing issues by concentrating on the the overall County data for comparison which is not relevant in this situation. The county is bigger than some states and the warehouse building concentration is local and completely overbuilt. Not to mention your report abandons the housing issues by concentrating on jobs that will not be able to afford housing in the local area. The forecast growths are based on county data and not relevant. The truck situation is extreme now and dangerous on the 215 freeway from the 91 coming up the hill and your own office admits there is no plans to extend the 215 with dedicated truck lanes. You already have residential housing with Village West but now claim the land is incompatible for housing. This section is full of nothing but assumptions with no supporting evidence.

I-924.2

I-924.3

I-924.4

You should also review the report in the Press Enterprise, on the World Logistics Center, March 8, 2023, with 40.6 million square feet of warehouse space starting development.

I-924.5

Thank you for allowing me to provide comments on this project.

Sincerely,

Lewis Allen
232 Bathurst Rd.
LJMAllen@aol.com

Letter I-924

Lewis Allen
March 10, 2023

I-924.1 This comment letter is Form Letter H – Alternatives with the addition of "Tesla just opened nearby and would probably be excited about contributing to this plan." The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Topical Response 8 - Alternatives.

I-924.2 This comment questions the jobs, housing, and population growth numbers included within Section 4.12, Population and Housing, in the Draft EIR. In response to this comment, please see Topical Response 5 – Jobs.

I-924.3 This comment discusses truck traffic on Interstate 215. Please see Response FL-G.4, for a discussion of I-215 assessment pursuant to Caltrans safety requirements.

I-924.4 This comment questions why residential use was not considered for the Project site. In response, please see Topical Response 8 – Alternatives.

I-924.5 This comment refers readers to an article on the World Logistics Center project. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

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From: Lisa Everson <leverson@earthlink.net>
Sent: Friday, March 10, 2023 7:37 AM
To: Dan Fairbanks
Subject: Development

Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project’s warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project’s land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college’s OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan’s goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran’s village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran’s Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan’s goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. “Airman State Park” would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan’s goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Lisa Everson
7642 Ayr Court
Riverside, CA 92508
leverson@earthlink.net

Letter I-925

Lisa Everson
March 10, 2023

I-925.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Melody Clark <melodyeclark@icloud.com>
Sent: Friday, March 10, 2023 5:54 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau Project, EIR, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents and is less than a quarter mile from a preschool. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.comment

Air Quality:

The draft EIR in section 4.2 refers to the dangers of particulate matter (PM) in the air. It cites that PM increases in the number and severity of asthma attacks, causes or aggregates bronchitis and other lung diseases and reduces the body's ability to fight infections. It also acknowledges that children exposed to PMs may experience a decline in lung function. Further, the draft EIR discloses that more than 90% of Diesel Particulate Matter (DPM), which comes from the operation of diesel trucks, is a subset of PM2.5, one of the most dangerous categories of PM.

While the draft EIR acknowledges some of the ill effects of PM, particularly regarding respiratory issues, I did not see any data or acknowledgment of what we know are serious neurological effects due to air pollution including specifically PM. Epidemiological studies consistently associate exposure to urban air pollution with increased risk of dementia. Air pollution has also been implicated in an increase in autism in children. I have listed just a few scientific articles below as an example of the research linking air pollution with neurological diseases, but there is a whole body of research on this topic. As you will see, particulate matter is especially implicated in neurological harm in children and adults.

Why has the EIR not informed the public of the serious consequences on cognitive health that will result from this Project? Perhaps it is because it would scare the public - asthma is one thing but autism and Alzheimer's Disease are a different kind of devastating outcome that the public should be made aware of. Given this information, the fact that the Project would be 794 feet from the Grove pre-school is quite literally immoral.

Even this overly optimistic draft EIR acknowledges that the Project will have significant and unavoidable impacts on air quality. Specifically, the AQ1 threshold of significance, both consistency criteria 1 and criteria 2, will not be met even with all of the available mitigation measures. What it does not disclose is the full impact of the reduced air quality on those who live in the region.

Research regarding the effects on cognitive health caused by the significant and unavoidable impacts on air quality by the proposed Project **must** be performed and reported to the public before this Project can proceed.

Justifications:

I understand that the draft EIR justifies the human cost of decreased air quality by saying there is an economic benefit to the community. I could see that some projects might bring a benefit to our community, such as projects that, for example, provide significant educational opportunities for our local kids. However, this Project does not provide any significant benefit to our community.

The argument that the 2,600 jobs supposedly created by this Project are sufficient to offset serious health harms is ludicrous. First, even if the Project initially does employee 2,600 workers, these workers will soon be replaced by automation. Indeed, a 2017 study done by researchers at the University of Redlands found nearly two thirds of Inland Empire jobs were at risk of automation in the next decades. Warehouse workers lead a list from the Institute of Spatial Economic Analysis (ISEA), a division of the University's School of Business. In 2016, the Inland Empire had 55,660 warehouse jobs with 47,310 of them automatable according to ISEA. The average annual wage was $29,000 which is far below what is required to live in the area where the Project will be located.

So, we will be left with the benefit of very few local jobs but all of the costs of air pollution and other significant health harms. And any economic gain would be wiped out by the additional health care costs for caring for people with autism and dementia. Of course the emotional costs of these diseases on loved ones are impossible to calculate.

Thank you for allowing me to provide comments on this project.

Sincerely,

Melody Clark, Ph.D.
5085 Queen St. Riverside, CA 92506

Melodyeclark@icloud.com

Becerra et al., “Ambient Air Pollution and Autism in Los Angeles County, California” Environ Health Perspective. 2013 Mar, 121(3): 380-386

Peters et al., “Air Pollution and Dementia: A Systematic Review “ J Alzheimer’s Dis 2019; 60 (Suppl) D: S145-S163

Sent from my iPad

Letter I-926

M. Clark
March 10, 2023

I-926.1 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

I-926.2 This comment raises concerns regarding health risks associated with Project DPM emissions. The health risks associated with DPM emissions are discussed in Recirculated Section 4.2, Air Quality. A health risk analysis was performed for the Project to evaluate the risks associated with diesel particulate matter at sensitive receptor locations (including Grove Preschool) using the latest health data for diesel particulate matter available from OEHHA. The analysis indicated that the Project would not result in significant health impacts for any sensitive receptors in the vicinity. Additionally, modeling was performed consistent with SCAQMD LST guidance to evaluate if emissions resulting from the construction or operation of the proposed Project would exceed localized significance thresholds for emissions of CO, NO_x, PM_{10}, and $PM_{2.5}$. The results of the analysis indicate that neither construction nor operational emissions would exceed the localized significance thresholds established by SCAQMD for any nearby sensitive receptors.

I-926.3 This comment disagrees with the assessment of the Project's community benefits and Project job generation. Public benefits provided by the Project would include increased job opportunities for local residents, preservation of open space, extension of the roadway infrastructure and the pedestrian and bicycle circulation system, a new approximately 60-acre public park, and construction of the Meridian Fire Station, at the intersection of Opportunity Way and Meridian Parkway (see Topical Response 6 – Meridian Fire Station, for additional details). Regarding Project job generation, please see Topical Response 5 – Jobs. Regarding automation, while existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

I-926.4 This comment cites two articles: "Ambient Air Pollution and Autism in Los Angeles County, California," and "Air Pollution and Dementia: A Systematic Review." Both of these articles discuss the potential health effects of air pollution. A detailed discussion about the potential health effects of air pollution is included in Recirculated Section 4.2, Air Quality.

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From: yeetmaster 1 <maosndeluhery@gmail.com>
Sent: Friday, March 10, 2023 10:35 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Mason Deluhery, 18870 Lurin ave riverside california 92508

Letter I-927

Mason Deluhery
March 10, 2023

I-927.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Magie Lacambra <mags0128@gmail.com>
Sent: Friday, March 10, 2023 4:43 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau Environmental Impact Report

Dear Mr. Fairbanks:

I am a homeowner in the Orangecrest neighborhood. I have lived in this beautiful neighborhood since 2004 and selected this area for several reasons, of which the open land on the northern border of our neighborhood was a major attraction. I have enjoyed this space for leisure walks, mountain bike rides, and walks with my dogs, for nineteen years. The natural landscape away from traffic, noise, concrete, and anything man made have been an important part of my life and something I treasure and fear of losing. I-928.1

With that said, thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods (mine just south of this area) located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips. I-928.2

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission

equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I-928.2 Cont.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Magie Lacambra
8462 Roxy Circle
Riverside, CA 92508
mags0128@gmail.com

Letter I-928

Magie Lacambra
March 10, 2023

I-928.1 This comment expresses personal experience of the Project site and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-928.2 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Magie Lacambra <mags0128@gmail.com>
Sent: Friday, March 10, 2023 5:04 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As an original homeowner in the Orangecrest Community I am writing to you with major concern over the proposed plans for the open land just north of our community known as the March JPA West Campus Upper Plateau. This beautiful open area offers calm and tranquility for those of us in this neighborhood, not to mention the unobstructed view of the beautiful mountain ranges to the north. This escape from the noise, pollution and congestion of the city is a valuable asset to our community and one that I personally enjoy with walks and mountain bike rides. I-929.1

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? I-929.2

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

I-929.2
Cont.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I urge you to weigh your decision on the future of this area as if you personally lived in our precious neighborhood.

I look forward to your response.

Sincerely,
Magie Lacambra
8462 Roxy Circle
Riverside, CA 92508
mags0128@gmail.com

Letter I-929

Magie Lacambra
March 10, 2023

I-929.1 This comment expresses personal experience of the Project site and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-929.1 This comment letter is Form Letter A – Aesthetics with the addition of: "I urge you to weigh your decision on the future of this area as if you personally lived in our precious neighborhood." This modification to the form letter does not raise any new or different issues. As such, in response to this comment, please see Form Letter A Response.

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From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Friday, March 10, 2023 4:59 PM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: Summary.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project).

I-930.1

Attached please find a summary comment letter.

Please email me to confirm receipt of this public comment.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

March 10, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. I-930.2

I have written a lot of letters on this project, but I wanted to summarize why I believe the Project will never be built as proposed, within the draft EIR context. This letter is not meant to be detailed, but merely a synopsis of the key issues that the Project, as proposed, cannot address. I-930.3

Inconsistencies with JPA Planning Documents

- Aesthetics p183 – AES-1 and AES-2 – The project will have a significant and unavoidable impact by adversely effecting scenic vistas I-930.4
- Air Quality p226 – AQ-1, AQ-2, and AQ-3 – The project will conflict with the 2022 AQMP, result in a cumulatively considerably increase in NO_2, ozone, $PM_{2.5,}$ and PM_{10} and expose sensitive receptors to cumulatively considerable toxic air contaminants. I-930.5
- Biological Resources p286 -BIO-1 and BIO-2 – The project will have substantial adverse impacts on candidate, sensitive, or special status species and Riversidean sage scrub. I-930.6
- Cultural Resources p 349 – CUL-1 – The project will irrevocably destroy weapons storage igloos unique to the state of California that have local and state significance. The construction of this project will destroy the property's historic character and a unique piece of March ARB that provides a unique look into Air Force history from World War II through the first Iraq War. I-930.7
- Energy Resources p 376 – ENG-1 - The project will result in wasteful and inefficient energy usage through unnecessary fossil fuel construction and operation equipment. These effects can be mitigated with appropriate electrification mitigation requirements. I-930.8
- Geology and Soils p 395 – GEO-1 – No details on given on terracing of slopes or how the temporary or permanent cut slopes will be performed, nor on the final grading of the overall project. Given the lack of detailed information, it is impossible to state that MM-GEO-1 on slope stability will be sufficient to prevent landslides due to the lack of details on the project plans. I-930.9

- Greenhouse Gas emissions – GHG-1 and GHG-2 – the project will generate substantial extra VMT and substantial emissions of greenhouse gases through construction, pouring of concrete foundations, and operational phase emissions of 2,000 heavy-duty trucks and 33,000 daily passenger trips. This will have a significant impact on the environment and is not adequately mitigated with the existing mitigation measures. I-930.10
- Hazards and Hazardous Materials – HAZ-1 – The Project has not demonstrated that soil to be graded in the project is free of contaminants including PCBs, PFAS, radioactivity, Agent Orange and other herbicides, and potential contaminants from the Air Force Landfill that may have migrated. Gridded soil testing throughout the project construction area is needed to assure the community the soil disturbance will not be hazardous. I-930.11
- Hydrology and Water Quality – HYD-2 – The Project will create impermeable concrete slabs over almost 300 acres of a hilltop, thus clearly decreasing groundwater infiltration and recharge. Groundwater recharge being unrecognized by the RWQCB Basin Plan does not mean it does not happen, it merely means it isn't directly recharging an aquifer used for humans right now. I-930.12
- Land Use and Planning – LU-2 –
    - The Project conflicts with 30 years of March JPA planning documents (Final Reuse Plan, General Plan, Draft General Plan 2010, 2012 CBD Settlement Agreement) that indicate that the Specific Plan area has never been considered for Industrial Zoning, while proposing industrial land use as the majority land-use category. I-930.13
    - The Project's proposed redesignation of Mixed-Use for warehouse uses 'business-park enterprises' overturns 25 years of established no warehouse uses in Mixed-Use zoning. I-930.14
    - The Project is not consistent with Land Use Element Transportation Goal 8 due to its lack of public transit access. I-930.15
    - The Project is not consistent with March JPA General Plan Goals for Housing – Residential zoning is allowed in the project under C2 or C1 zoning at densities of 6.0 or 3.0 units per/acre, respectively. Residential Zoning is not an incompatible land-use as shown by the surrounding residential communities in the same ALUC zoning categories. I-930.16
- Noise – NOI-1, NOI-2 – The project has not been adequately evaluated for noise levels due to insufficient information on individual parcel site plans and an incomplete analysis of the noise levels of the full 60 acre Park which was not included in the Project's noise analysis. I-930.17
- Population and Housing
    - P656 – Jobs/housing balance – The County of Riverside is 'out of compliance' with Housing Element Law I-930.18
    - POP-1 – This project was not included in 2016 SCAG RTP-SCS and would thus potentially induce population growth. I-930.19
    - This entire section relies on out-of-date and incorrect SCAG projections that do not reflect 2021-2022 population, jobs, and housing numbers that are significantly different and paint an entirely different picture of the local jobs/housing balance. Housing and Rental prices are skyrocketing due to insufficient supply and unemployment is at a 50-year low nationally and an all-time measured low in the county and MSA. The high cost of housing is actually inducing net migration out of the state of California. Finally, the jobs/housing ratio based on current California EDD and census household numbers indicates a ratio of imbalance in favor of jobs (1.35, rather than the 1.05 quoted). I-930.20

- Public Services – PUB-1 – The project will add to existing traffic and enforcement concerns within the March JPA planning area, including drag racing, spin-outs, and truck route violations. $100,000 Contributions from the project for 2 years will not cover the 30+ year operational lifetime enforcement requirements and will not cover City of Riverside costs at all. I-930.21
- Transportation – TRA-1 – I-930.22
    - The proposed circulation throughout the project area is completely inconsistent with the General Plan Circulation. Barton St. does not connect through, Brown St. does not connect to Cactus Ave, and Cactus Ave ends at Camino Del Oro, not at Barton. As a result, the planned circulation is in conflict with program policies.
    - Proposed Class II bike lanes are incompatible with arterial truck collector routes and are a dangerous hazard to cyclists. Class IV bike lands with physical barriers are needed to prevent cyclists from deadly accidents and avoid conflict with TRA-1 and TRA-3. I-930.23
    - Transportation trip rates are inconsistent with SCAQMD rule 2305 weighted truck trip rates that are appropriate for speculative facilities with unknown tenants. Using Rule 2305 truck trip rates would double the truck trips and VMT and substantially change the air quality and health risk assessment sections. I-930.24
- 'Tribal Cultural Resources – CUL - 1Impacts to Tribal Cultural Resources are significant and unavoidable with the proposed Project. No agreement has been entered into with the local tribes through direct government-to-government consultation, nor has a boundary been determined. I-930.25
- Environmental Justice – The draft EIR fails to mention Environmental Justice despite the project being located in a 98th percentile impact census tract. I-930.26
- Cumulative Impacts – The Project fails to adequately address cumulative impacts of nearby and regional warehouse projects on all environmental resource areas. We have provided a list for consideration. I-930.27

No Non-Industrial Alternative Plans

Section 6 provided a couple of industrial-centric alternative plans with no real thought behind them. Members of RNOW have been asking for real alternative for 12 months, including residential, solar power generation, battery storage, and other non-industrial uses that would be less intensive. The Residential Alternative 'Considered but rejected' indicates that the project (1) fails to generate jobs and (2) is inconsistent with existing land-use zoning.

We agree that a residential alternative would not generate long-term jobs. However, we note that the current jobs situation is such that there are excess jobs and insufficient housing regionally. The RHNA is literally requiring jurisdictions to put in sufficient housing and the member jurisdictions of the MJPA are not doing a particularly great job at adding housing. Additionally, we note that industrial zoning, as proposed by the Project and all alternatives presented by the Project applicant is equally inconsistent with existing land-use zoning. Moreover, industrial zoning is inconsistent with a host of other issues identified in Air Quality, Greenhouse Gases, and other sections. I-930.28

Members of the community have provided three alternative plans that are more consistent with the existing land-use and project goals than the proposed Project.

1 – Campus alternative – an actual campus for college students and researchers.

2 – Veteran's village alternative – a mixed-use low density housing and veteran's services center, including medical, mental-health, jobs, and entrepreneurship support.

3 – State or Local Park alternative – a very low impact addition to the March Air Field Museum that would celebrate the cultural heritage of the Air Force, the unique Weapons Storage Igloos, and a walking tour with historical plaques about Camp Haan and Camp Anza.

I-930.28
Cont.

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses

R-NOW

Letter I-930

Mike McCarthy
March 10, 2023

I-930.1 This comment is introductory and refers to an attached letter. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-930.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

I-930.3 This comment introduces the intent of the comment letter and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-930.4 This comment asserts that the Project would result in significant and unavoidable aesthetic impacts. As discussed in Section 4.1, Aesthetics, of the Draft EIR and Topical Response 1 - Aesthetics, with implementation of mitigation measures, the Project would result in less than significant impacts related to aesthetics. No revisions to the analysis are required in response to this comment.

I-930.5 This comment asserts the Project would conflict with the 2022 AQMP, result in a cumulatively considerable increase in NO_2, ozone, $PM_{2.5}$ and PM_{10}, and expose sensitive receptors to cumulatively considerable toxic air contaminants. As analyzed in Recirculated Section 4.2, Air Quality, the Project would result in significant and unavoidable impacts related to the conflict with or obstruction of implementing an applicable air quality plan. Similarly, because the Project would exceed the project-level thresholds for regional VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ emissions during operation, The Project's cumulative impacts with respect to such emissions would be considerable and significant. With regard to toxic air contaminants, as explained in Recirculated Section 4.2, Air Quality, SCAQMD does not have an approved methodology for evaluating cumulative TAC health impacts. Per SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, projects that do not exceed the project-specific significance thresholds are generally not considered to be cumulatively significant. Because the proposed Project does not exceed the applicable cancer and non-cancer significance thresholds, TAC emissions generated by the proposed Project would not be considered cumulatively considerable. Please see Recirculated Section 4.2, Air Quality, for additional information.

I-930.6 This comment asserts that the Project would result in substantial adverse impacts on candidate, sensitive, or special status species and Riversidean sage scrub. As noted throughout Section 4.3, Biological Resources, of the Draft EIR, with incorporation of mitigation, all potentially significant impacts to candidate, sensitive, or special status species and Riversidean sage scrub are reduced to less than significant levels. No revisions to the analysis are required in response to this comment.

I-930.7 This comment asserts that the Project would destroy weapons storage igloos unique to the state of California that have local and state significance. As detailed in the Revised Weapons Storage Area Report (Appendix E-2) and the BFSA Response to Comments (Appendix E-3), the WSA report erroneously stated the WSA igloos were the only United States Air Force-associated munitions storage

igloos in California. Travis Air Force Base includes munitions storage igloos as part of the Travis AFB ADC Readiness National Register Historic District Area. Munitions bunkers are also found at Beale Air Force Base in Marysville and Edwards Air Force Base in Edwards. Further, the WSA igloos are not unique or distinctive examples of munitions storage igloos in California or the local region and are among the most common military-related weapons storage constructions. For example, similar igloos are regionally found at Fallbrook Ammunition Depot, Naval Weapons Station Seal Beach, and Marine Corps Air Station El Toro. Additionally, Concord Naval Weapons Station in San Francisco includes a larger weapons storage area that features various underground and overground bunkers constructed in different periods and styles. Sierra Army Depot in Herlong includes over 800 munitions storage igloos and igloos remain from the closed Benicia Arsenal in Benicia. The WSA report has been revised to accurately describe the state and regional context for the WSA igloos. The WSA and its individual buildings were determined not eligible under NRHP, CRHR, or MJPA CEQA Guidelines criteria for historic resources at the national, state, or local level.

I-930.8 This comment asserts that the Project would result in wasteful and inefficient energy usage through unnecessary fossil fuel use during construction and operations. In response to this comment, please see Section 4.5, Energy, of the Draft EIR, and Recirculated Section 4.2, Air Quality. As discussed in Recirculated Section 4.2, Air Quality, additional mitigation measures that would result in more efficient use of energy and fossil fuels are now incorporated into the Project.

I-930.9 This comment states that the Draft EIR does not provide specific detail on the proposed grading for the Project. Further, the comment states MM-GEO-1 would not be sufficient to prevent landslides due to lack of details. Appendix B includes the conceptual grading plans for the Project. Additionally, Section 6.8, Grading, of the proposed Specific Plan sets forth the grading plan development standards. As detailed in Section 4.6, Geology and Soils, MM-GEO-1 addresses potential slope stability impacts as a result of grading for the proposed Campus Development. The preliminary geotechnical investigation, included as Appendix G-1 to the Draft EIR, revealed that there are no indications of slope instability and no evidence of on-site landslides, debris flows, or rock falls. Therefore, the Project site would not be susceptible to landslides. However, as noted by the comment, grading could result in slope failure/collapse. As such, MM-GEO-1 is incorporated to reduce the potential for slope instability during grading and construction. Regarding the comment's concern for lack of detail, the Project includes phased construction scenarios for the Specific Plan Area across the Project site. The mitigation measure is designed to be consistent with applicable guidelines and regulations for March JPA and to be triggered prior to the issuance of grading permits for each proposed future development analyzed under the Specific Plan. Moreover, implementation of the mitigation measure would be monitored by a certified engineering geologist for feasibility. Therefore, no revisions to the analysis are required in response to this comment as the proposed mitigation is drafted in accordance with CEQA Guidelines Section 15126.4(a)(1)(B).

I-930.10 This comment states that the Project will generate substantial extra VMT and substantial emissions of greenhouse gases such that a significant impact on the environment would occur and that impact is not adequately mitigated with existing mitigation measures. Please see Response A-8.7 for a detailed discussion of March JPA's selection of GHG thresholds and the Project's consistency with the Riverside County Climate Action Plan.

I-930.11 This comment asserts that the Project has not demonstrated soils to be free of contaminants including PCBs, PFAS, radioactivity, Agent Orange, and other herbicides and potential contaminants from the Air Force Landfill. In response to this comment, please see Recirculated Section 4.8, Hazards and Hazardous Materials, and Topical Response 3 – Hazards.

I-930.12 The comment states the Project's construction of impermeable concrete slabs across the Project site would decrease groundwater infiltration and recharge. The comment also asserts that groundwater recharge occurs on site. This comment raises concerns with the impact analysis found within Section 4.9, Hydrology and Water Quality, specifically Threshold HYD-2. The Draft EIR determined less than significant impacts would occur as a result of the proposed Project. The impact analysis concurred with the comment's statement regarding an increase in impermeable surfaces on site. However, as supported by the Master Project Specific Water Quality Management Plan (included as Appendix K-2) of the Draft EIR, the Project site's soils are characterized by having slow infiltration rates and are underlain by relatively impermeable granitic bedrock. As such, the Project site would not be conducive to substantial groundwater recharge, thus, would not substantially interfere with groundwater recharge and result in potentially significant impacts. No revisions to the analysis are required in response to this comment.

I-930.13 This comment asserts that the Project conflicts with the Final Reuse Plan, General Plan, Draft General Plan 2010, and the 2012 Settlement Agreement. The Draft General Plan 2010 was never adopted and is not applicable to the Project. In response, please see Recirculated Section 4.10, Land Use and Planning, and Topical Response 4 – Project Consistency.

I-930.14 This comment questions whether the proposed Specific Plan's definition of Mixed Use is consistent with the General Plan's definition regarding warehousing. The March JPA General Plan excludes "major warehousing uses" from Mixed Use designated parcels. The proposed Specific Plan includes business enterprise within the Mixed Use designation. Business enterprise use is not major warehousing and is intended to provide a transitional environment that allows for limited commercial and office uses in conjunction with small scale industrial warehouse activity. Under Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. The proposed Specific Plan's Mixed Use definition is consistent with the March JPA General Plan. No changes or additions to the project description or analyses including the Draft EIR are required.

I-930.15 The comment asserts that the Project is not consistent with Goal 8 of the Land Use Element but references text of Goal 8 of the Transportation Element. As detailed in Table 4.10-1 of Recirculated Section 4.10, Land Use and Planning, the Project site would be served by both local transit and inter-city passenger rail service. Moreover, during construction, bus stops and shelters would be approved by the Riverside Transit Agency, as implemented by MM-GHG-11, which would provide the funding for a bus shelter on Alessandro Boulevard. Therefore, the Project would be consistent with this goal. No changes or additions are required in response to this comment.

I-930.16 The comment asserts the Project is not consistent with housing goals found within the March JPA General Plan. Recirculated Section 4.10, Land Use and Planning, includes a consistency analysis within Table 4.10-1, Project Consistency with March JPA General Plan Goals. Of note, the General Plan limits residential land uses within the March JPA planning area because housing is incompatible with airfield

uses adjacent to the planning area. The proposed Project does not include residential land uses. As such, the proposed Project maintains consistency with the General Plan's absence of a residential land use designation within the planning area. This comment inaccurately states the Project site is zoned C-2. The March JPA General Plan designates the Project site as Business Park, Industrial, and Park/Recreation/Open Space. The Project site has not been assigned a zoning designation per the official March JPA Zoning Map, as shown on Figure 3-3, March JPA Zoning Designations, of Recirculated Chapter 3, Project Description. The comment may be referencing the Project site's compatibility zone under the March ARB/IPA Airport Land Use Compatibility Plan (ALUCP). Under the ALUCP, the Project site is located within the C1 Primary Approach/Departure Zone and C2 Flight Corridor Zone. The ALUCP provides noise and safety policies governing development of compatible future land uses in areas within the airport influence area.

I-930.17 The comment asserts the noise impacts analyzed in the Draft EIR are not adequately evaluated due to insufficient information on individual parcel site plans and an incomplete analysis for the proposed Park. The noise analysis is based on field noise measurements and operational noise levels prediction using CadnaA software (a noise prediction model), presented in the Project Noise and Vibration Impact Analysis, included as Appendix M-1 of the Draft EIR. On-site operational noise analyses in Section 4.11, Noise, of the Draft EIR describe noise level impacts associated with the expected typical daytime and nighttime activities within the Specific Plan Area to present the worst-case noise scenarios. The analysis includes potential noise level impacts associated with the Project's Park activities. As such, the analysis concludes that the Project would not exceed the daytime and nighttime exterior noise level standards. Therefore, the operational noise impacts are considered less than significant at the nearby noise-sensitive receiver locations, and no mitigation is required.

I-930.18 The comment states that Riverside County is out of compliance with Housing Element law. Although the Draft EIR identifies the County of Riverside as a jurisdiction which is required to plan for housing, the agency's compliance with Housing Element law is not applicable or relevant to the adequacy of the Draft EIR's environmental analysis. Regardless of the certification status for its Housing Element, unincorporated Riverside County is required to plan for the RHNA goal. No changes or additions to the Draft EIR are required in response to this comment.

I-930.19 The comment asserts the Project is not included within the 2016 RTP/SCS and, thus would induce population growth. The analysis within Section 4.12, Population and Housing, of the Draft EIR relies on the latest RTP/SCS by SCAG (i.e., Connect SoCal or the 2020-2045 RTP/SCS). Moreover, as detailed within Section 4.12, the Project would result in employment growth, which would be within the growth projections for the region. Please see Topical Response 5 – Jobs for additional discussion.

I-930.20 The comment asserts the Draft EIR analysis relies on inadequate data to assess impacts related to jobs/housing balance. The Draft EIR utilized SCAG's data from the most recent RTP/SCS (i.e., Connect SoCal). This is in line with other environmental analysis within the EIR that demonstrates consistency with regional plans such as the Air Quality Management Plan, which is designed to be consistent for regional planning purposes. At the time of drafting the Draft EIR, data from the US Census Bureau was not readily available across all data source needs (i.e., population, housing, and employment). Given this, the Draft EIR identified SCAG's 2020-2045 RTP/SCS (also known as Connect SoCal) as a basis for analysis due to the fact that data sources were all from the same source and to prevent data gaps between topics and available dates. For discussion on employment data, please see Topical Response 5 – Jobs for more discussion.

A jobs/housing balance is a ratio that indicates the number of available jobs in a jurisdiction compared to the number of available housing units. The ratio is one potential indicator of a community's ability to reduce commuter traffic and overall VMT by maintaining a balance between employment and housing in close proximity (Section 4.12, Population and Housing). An analysis of jobs/housing balance is based on the opportunities for a population who lives and works in an area. It is not an indication or requirement of the Project to directly meet the employment needs of the surrounding community. However, this is a desired objective of the Project, as detailed in Recirculated Chapter 3, Project Description.

As suggested by the comment, the jobs/housing ratio would be "jobs-rich," or above the 1.0 to 1.29 jobs per household "balanced" range. However, despite the differences in data sources, the Project would continue to contribute a nominal employment growth to existing and future projected conditions of Riverside County. Thus, the conclusions of the Draft EIR would remain the same. The Project would not result in substantial unplanned population growth.

I-930.21 The comment raises traffic and public safety concerns (i.e., drag racing and truck route violations) and asserts the Project's contribution/payment to the Sheriff's Department would not serve the lifetime of the Project. This comment raises concern for street racing within the Project site's vicinity and asserts existing police protection services would be indirectly impacted due to the proposed Project. The comment's assertion is speculative. Under existing conditions, the isolation and sparse development surrounding the Cactus Avenue cul-de-sac can be attractive to individuals wishing to engage in such activities. Under the proposed Project, this cul-de-sac would be eliminated, and Cactus Avenue would extend to the Project site. Project traffic would significantly reduce the times when that area is isolated, thereby relieving pressure on local law enforcement. Section 4.13, Public Services, determined the Project would not have a significant effect on police protection services. Under PDF-TRA-3, two payments in the amount of $100,000 would be made to offset cost increases for Sheriff Department services. PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-930.22 The comment raises concern with circulation on the Project site and states the Project would not be consistent with the March JPA General Plan. As detailed in Section 3.5.6, Requested Approvals and Entitlements, the Project requests the approval of General Plan Amendment 21-01, which would include a modification to Exhibit 2-1, Transportation Plan, and Exhibit 2-3, Transportation Road Systems, of the General Plan, to allow for road connection and circulation changes not currently allowed or available under the General Plan or existing conditions. No changes or additions are required in response to this comment.

I-930.23 The comment asserts that the proposed Class II bike lanes are incompatible with the truck routes planned for the Project site. The comment requests Class IV bike lanes with physical barriers to prevent hazards to cyclists. As discussed in Section 4.15, Transportation, of the Draft EIR, there are currently Class II bike lanes along Alessandro Boulevard, Cactus Avenue, Meridian Parkway, and Van Buren Boulevard near the Project site. All of these are designated truck routes. Class II bikeways are bike lanes which are established adjacent to traffic lanes and share the same roadway. The Draft EIR

determined the inclusion of 5-foot Class II bicycle lanes where none currently exist would result in no impacts related to safety or the consistency with applicable program, plan, or policy addressing the circulation system. This is consistent with the existing bicycle network throughout the rest of the March JPA Planning Area.

I-930.24 The comment asserts transportation trip rates are inconsistent with SCAQMD Rule 2305. See Response FL-B.7 for an explanation as to why SCAQMD Rule 2305 is not appropriate to use for truck trip rates.

I-930.25 The comment asserts that impacts to tribal cultural resources are significant and unavoidable and states no agreement has been entered with the local tribes. As detailed further in Section 4.16, Tribal Cultural Resources, two tribes, the Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians consulted with March JPA under AB 52. Furthermore, the incorporation of MM-CUL-1 was approved by the consulting tribes and would fully document the boundaries of the sites within or directly adjacent to the Project site. Moreover, the Draft EIR concluded significant and unavoidable impacts would occur even with the application of MM-CUL-1 through MM-CUL-13.

I-930.26 The comment asserts the Draft EIR fails to analyze environmental justice. In November 2023, March JPA released a Draft Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a) (March JPA 2023). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. Recirculated Section 4.10, Land Use and Planning, includes a consistency analysis for the Draft Environmental Justice Element policies applicable to the Project.

I-930.27 This comment asserts that the Draft EIR fails to adequately address cumulative impacts of nearby and regional warehouse project. Furthermore, the comment states a list was provided for consideration. However, there is no list included within this comment letter. Regarding cumulative impacts, the impact analyses throughout the Draft EIR includes an assessment of cumulative considerable impacts in accordance with Section 15355 of the CEQA Guidelines. See Topical Response 7 – Cumulative Projects.

I-930.28 This comment discusses alternatives to the Project that should be considered. In response, please see Topical Response 8 – Alternatives.

From: Nicole Bernas <onecosmiclove@icloud.com>
Sent: Friday, March 10, 2023 10:08 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

March 9, 2023

Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE:PUBLIC COMMENT FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project site consists of over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas. The proposed project is less than a quarter mile from a preschool, and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently and adamantly requested by the community.

This area consists of beautiful, pristine habitat which is home to many birds, reptiles, and animals. As an individual who spent her career protecting threatened and endangered species and their habitats, I have serious concerns about the shrinking of open spaces and destruction of habitat in the City and County of Riverside. I ask that you require the project applicant to make every effort to adequately survey for and preserve endangered and threatened species. Many City and County of Riverside residents consider open-space a treasured amenity.

Wildlife

1. The applicant should expand their analysis to include theWestern Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? It is my understanding that the final EIR should include wildlife studies from within a one-year timeframe to satisfy the requirements of the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why was the plant survey during a drought year? How can one say it is absent or assess the significance of impact unless its absence is documented during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that rare plant life is not being destroyed unless a more thorough and meaningful survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing habitat mitigations? How can you ensure the public that these mitigation measures will be enforced? The conservation easement and management entity 10 years after the settlement should be formalized prior to any approvals being granted.

Thank you for allowing me the opportunity to provide comments on this project.

Sincerely,



Nicole Bernas
19981 St. Francis Drive
Riverside, CA 92508
onecosmiclove@icloud.com

Letter I-931

Nicole Bernas
March 10, 2023

I-931.1 This comment is a modified version of Form Letter C – Biological Resources with the addition of the following: "This area consists of beautiful, pristine habitat which is home to many birds, reptiles, and animals. As an individual who spent her career protecting threatened and endangered species and their habitats,"; "Many City and County of Riverside residents consider open-space a treasured amenity." These modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter C Response.

The comment also states: "The conservation easement and management entity 10 years after the settlement should be formalized prior to any approvals being granted." The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity.

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From: Nicole Bernas <onecosmiclove@icloud.com>
Sent: Friday, March 10, 2023 10:18 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project site consists of over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

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

Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. **How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built?**

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic section to reflect the truth.

Sincerely,
Nicole Bernas
19981 St Francis Dr

Letter I-932

Nicole Bernas
March 10, 2023

I-932.1 This comment letter is Form Letter G – Traffic with the addition of: "Children were late for school, parents were late for work, etc." and "not to mention the increased burden of road maintenance costs to the City and County." The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter G Response.

INTENTIONALLY LEFT BLANK

From: Nicole Bernas <onecosmiclove@icloud.com>
Sent: Friday, March 10, 2023 1:03 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

March 9, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA) 14205 Meridian Parkway, Suite 140 Riverside, CA 92518

RE: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project site consists of over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently and adamantly requested by the community.
I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:

1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis, including PFAS, PFOS, perchlorate, trichloroethylene, perchlorothylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.
In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.
The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health, and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to the issuance of demolition or grading permits. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be properly removed.
Thank you for allowing me to provide comments on this project.

Sincerely,
Nicole Bernas
19981 St. Francis Drive Riverside, CA 92508 onecosmiclove@icloud.com

Letter I-933

Nicole Bernas
March 10, 2023

I-933.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Nicole Bernas <onecosmiclove@icloud.com>
Sent: Friday, March 10, 2023 1:10 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

March 9, 2023
Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA) 14205 Meridian Parkway, Suite 140 Riverside, CA 92518

RE: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project site consists of over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.
As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.
Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the

adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?
In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses."

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first 3⁄4 mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated, "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high- technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for allowing me the opportunity to comment on your project.

Sincerely,
Nicole Bernas
19981 St. Francis Drive Riverside, CA 92508 onecosmiclove@icloud.com

✨✨✨

Letter I-934

Nicole Bernas
March 10, 2023

I-934.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Nicole Bernas <onecosmiclove@icloud.com>
Sent: Friday, March 10, 2023 1:18 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

RE: PUBLIC COMMENT ON RECORD FOR THE WEST CAMPUS UPPER PLATEAU PROJECT, ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NO. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1) Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents),
2) Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I was born in an area surrounded by warehouses and truck traffic, and suffered with respiratory related illness as was diagnosed with asthma. Many residents and generations of residents suffered from lung issues, including asthma and COPD. There were many days the schools would prohibit us from having recess or participating in physical activity due to the air quality being harmful. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening date of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Nicole Bernas
19981 St. Francis Drive.
Riverside, CA 92508
OneCosmicLove@icloud.com



Letter I-935

Nicole Bernas
March 10, 2023

I-935.1 This comment letter is a modified version of Form Letter B – Air Quality and in response to the comment, please see Form Letter B Response.

The comment includes an additional comment that: "I was born in an area surrounded by warehouses and truck traffic, and suffered with respiratory related illness as was diagnosed with asthma. Many residents and generations of residents suffered from lung issues, including asthma and COPD. There were many days the schools would prohibit us from having recess or participating in physical activity due to the air quality being harmful." Recirculated Section 4.2, Air Quality and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts. The Project would result in less than significant human health or cancer risks.

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From: Yvonne Fernandez <yvonnefernandez3829@yahoo.com>
Sent: Friday, March 10, 2023 2:32 PM
To: Dan Fairbanks
Subject: Fwd: Warehouse West Campus Upper Plateau

Begin forwarded message:

From: Yvonne Fernandez <yvonnefernandez3829@yahoo.com>
Subject: Warehouse West Campus Upper Plateau
Date: March 10, 2023 at 2:24:43 PM PST
To: fairbanks@marchipa.com

I Owen Turner, a resident of OrangeCrest Community, do oppose the building of Commercial Warehouses. It is a known fact, to build warehouses in our neighborhood will impact our lives. It will give us a higher Police presence by drawing negative elements, reducing our safety and security of our neighborhood. By increasing roadway access for trucks, foot traffic, and other undesirable traffic will increase. To unearth and release components, and chemicals that have long been disregarded by the military and government agencies. This will be a health hazard to our community! Our air we breath and water we drink can be negatively impacted. Are you willing to take this risk over profit? Our Community has a long history of large sporting events for children. Your Warehouses will undoubtably invite an alarming concern for safety of our children. As we get older you are purposely decreasing our Communities quality of life for profit. You risk wild life and any endangered species that reside in the untapped acres.

I-936.1

Owen Turner
20122 Dayton Street
Riverside 92508

Letter I-936

Owen Turner
March 10, 2023

I-936.1 The comment expresses opposition to the Project due to potential impacts associated with safety and security, truck traffic, the release of hazardous materials, air quality and water quality impacts, health hazards, and impacts to wildlife. Discussion of impacts associated with each of these topic areas is included in the EIR. Safety and security impacts are discussed in Section 4.13, Public Services, truck traffic impacts are discussed in Section 4.15, Transportation, hazards and hazardous materials impacts are discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, air quality impacts are discussed in Recirculated Section 4.2, Air Quality, water quality impacts are discussed in Section 4.9, Hydrology and Water Quality, health hazard impacts are discussed in Recirculated Section 4.2, Air Quality, and impacts to wildlife are discussed in Section 4.3, Biological Resources. As such, no further response is provided.

INTENTIONALLY LEFT BLANK

From: Pete Elliott <speakdiesel@gmail.com>
Sent: Friday, March 10, 2023 3:00 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Public Comment Letter for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: DEIR Response Letter.docx

Mr. Fairbanks,

Please accept the attached response letter to the Draft Environmental Impact Report for the West Campus Upper Plateau Project. Thank You! I-937.1

Sincerely,

Pete Elliott
R-NOW

9 March 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. I-937.2

I am writing to point out deficiencies found in the Draft Environmental Impact Report (DEIR) concerning the West campus Upper Plateau that was submitted for review and comment. As a concerned citizen, I am deeply troubled by the negative impacts this project will have on the surrounding community and environment and apparent lack of diligence undertaken when completing the DEIR. As there are many issues, I will address the following: I-937.3

One major issue with this project is the significant increase in diesel truck traffic it will bring and the negative impacts that will be imposed. According to recent studies, the cost per mile to rebuild roadways to commercial truck standards ranges from $1 million to $5 million. The Reason Foundation's Annual Highway Report also states that the United States has a significant backlog of road repairs, and the backlog is estimated to be $740.6 billion, increasing by $15 billion annually. Increased truck traffic will worsen the condition of our roads, which will be a significant cost to repair. The increase in truck traffic will have a negative impact on roadways, leading to increased congestion, wear and tear, and the need for costly repairs. When considering the cost to build roadways in California, the California Department of Transportation projects it costs approximately $1.2 million per mile to rebuild roadways to commercial truck standards. Additionally, statistics from the Reason Foundation's Annual Highway Report indicate that the cost to maintain and repair California's roadways is already significantly higher than the national average. The Draft Environmental Impact Report makes no mention of the cost of roadway repair, timelines for roadway repair, projected costs for roadway repair for this project or how this JPA, Developer or future tenants will contribute, meaningfully, and on an ongoing basis, to mitigation measures or any relief of the burden of these costs borne by the taxpayer.

I-937.3 Cont.

The Riverside County Sheriff's Department and the Riverside Police Department will both be called upon to address the increase enforcement burdens this project will impose. Without revenue streams, the costs of those burdens are then passed on to the taxpayer. Combined enforcement by the Riverside County Sheriff's Department and the Riverside Police Department could help ensure that truck drivers are adhering to traffic laws and regulations, reducing the potential for accidents and damage to roads.

I-937.4

However, increased police enforcement comes at a substantial cost. According to the Bureau of Labor Statistics, the average salary for a police officer in California is approximately $100,000

I-937.5

per year. Additionally, with the cost of living increasing each year, it is likely that these costs will continue to rise. These numbers are the average. The cost of Riverside a County Sheriff's Deputy and/or a Riverside Police Officer are higher. The DEIR fails to address the potential costs associated with the need for increased police enforcement, leaving a significant gap in the analysis.

I-937.5 Cont.

The Riverside County Sheriff's Department has jurisdiction over the project area, but the Riverside Police Department will also be impacted due to increased truck traffic congestion and enforcement along prohibited roadways. While the DEIR mentions that the JPA contracts with the Riverside County Sheriff for additional law enforcement coverage of 40 hours per week, it does not provide any specific details on how this enforcement time is spent. There are no statistics presented that any of this extra contracted time is utilized conducting traffic related enforcement. Furthermore, the DIER does not address the ongoing traffic enforcement and other law enforcement burdens outside of that 40 hours and does not address the traffic enforcement burdens placed on the Riverside Police Department. In addition, the DEIR makes no mention of any additional funding, or lack thereof, to the Riverside Police Department for any additional enforcement required as a result of this project. Without specific information to address these deficiencies, it is impossible to assess the feasibility of this proposal or to determine if any changes would be effective in mitigating the impacts of diesel truck traffic on roads surrounding the project area and spanning several jurisdictions.

I-937.6

I-937.7

Fortunately, Riverside Neighbors Opposing Warehouses (R-NOW) has proposed three alternative plans that would mitigate the negative effects of increased truck traffic on government resources. These alternatives include:

The Campus Approach: A project that focuses on expanding the University of California Riverside's OASIS, CARB, CERT, and economic development programs, mixed with a business

I-937.8

park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

The Veterans Village Approach: A project that includes a veteran's village that incorporates open space and a developed park, low-density affordable veteran housing, medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

The State or County Park Approach: A minimally invasive alternative plan that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas.

I-937.8 Cont.

I strongly urge the March Joint Powers Authority (JPA) to consider these alternate plans, which hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant. These plans will offer long-term quality job growth, preserve valuable open space, and provide recreational opportunities for residents to enjoy a better quality of life.

Thank you for your attention to this important matter,

Pete Elliott
R-NOW

Letter I-937

Pete Elliot
March 10, 2023

I-937.1 This comment refers to an attachment and does not raise any specific environmental issues or concerns about the adequacy of the environmental analysis within the Draft EIR. As such, no further response is provided.

I-937.2 This comment describes the Project vicinity and does not raise any specific environmental issues or concerns about the adequacy of the environmental analysis within the Draft EIR. As such, no further response is provided.

I-937.3 This comment states that the increase in truck traffic associated with the Project would have negative impacts on roadways, leading to increased congestion, wear and tear, and the need for costly repairs. As discussed in Section 4.15, Transportation, of the Draft EIR, WRCOG is responsible for establishing and updating the Transportation Uniform Mitigation Fee (TUMF) program. TUMF is a multijurisdictional impact fee program that funds transportation improvements on a regional and sub-regional basis associated with new growth. All new development in each of the participating jurisdictions is subject to TUMF, based on the proposed intensity and type of development. TUMFs are submitted by the applicant and are passed on to WRCOG as the ultimate program administrator. TUMF funds are distributed on a formula basis to the regional, local, and transit components of the program. March JPA participates in the TUMF program. The Project Applicant will be subject to the TUMF program and will pay the requisite TUMF at the rates then in effect. The Project Applicant's payment of the requisite TUMF at the rates then in effect pursuant to the TUMF Program will mitigate its contribution to deficiencies to TUMF-funded facilities. Additionally, commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).[1]

I-937.4 This comment is about truck route enforcement. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included

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

as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-937.5 This comment is about police salaries and cost of living, which is outside the scope of CEQA and the EIR. The comment does not raise any specific questions or concerns about the adequacy of the environmental analysis included within the Draft EIR. As such, no further response is provided.

I-937.6 This comment is about enforcement activities and requests a breakdown of how the 40 hours of enforcement time is spent. Regarding enforcement, please see Response I-937.4, above. The breakdown of how the 40 hours of enforcement time is spent is beyond the scope of the environmental impact analysis for the Project, and as such, no further response is provided.

I-937.7 This comment is about enforcement and funding. In response, please see Responses I-937.3 and I-937.4, above.

I-937.8 This comment requests consideration of the three additional alternatives presented in Form Letter H, Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

From: Pete Elliott <speakdiesel@gmail.com>
Sent: Friday, March 10, 2023 11:38 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,
Pete Elliott
Dayton St.
Riverside, CA 92508
speakdiesel@gmail.com

<include name, address, email in signature line>

Letter I-938

Pete Elliot
March 10, 2023

I-938.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: Pete Elliott <speakdiesel@gmail.com>
Sent: Friday, March 10, 2023 3:07 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. In addition, the DEIR makes no mention of mitigation of increased electrical usage through the utilization of any renewable sources. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of any delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,

Pete Elliott
Dayton St., Riverside, CA

Letter I-939

Pete Elliot
March 10, 2023

I-939.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Pete Elliott <speakdiesel@gmail.com>
Sent: Friday, March 10, 2023 3:08 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Pete Elliott
Dayton St., Riverside, CA
speakdiesel@gmail.com

Letter I-940

Pete Elliot
March 10, 2023

I-940.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Pete Elliott <speakdiesel@gmail.com>
Sent: Friday, March 10, 2023 3:09 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes are incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,

Pete Elliott
Dayton St., Riverside, CA
speakdiesel@gmail.com

Letter I-941

Pete Elliot
March 10, 2023

I-941.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Pete Elliott <speakdiesel@gmail.com>
Sent: Friday, March 10, 2023 3:11 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the

general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Pete Elliott
Dayton St., Riverside, CA
speakdiesel@gmail.com

Letter I-942

Pete Elliot
March 10, 2023

I-942.1 This comment letter is Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Pete Elliott <speakdiesel@gmail.com>
Sent: Friday, March 10, 2023 3:12 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Pete Elliott
Dayton St., Riverside, CA

Letter I-943

Pete Elliot
March 10, 2023

I-943.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Pete Elliott <speakdiesel@gmail.com>
Sent: Friday, March 10, 2023 3:13 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,
Pete Elliott
Dayton St., Riverside, CA
speakdiesel@gmail.com

Letter I-944

Pete Elliot
March 10, 2023

I-944.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Patricia Reynolds <preynolds6@gmail.com>
Sent: Friday, March 10, 2023 9:33 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Re: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). I have lived in Riverside for over 60 years, am a current resident of Canyon Crest, as well as an active community member. It has come to my attention that the EIR for the JPA warehouse development is seriously flawed.

This Project will site over 4.7 million additional square feet of total warehouse space, surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that do not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant have no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area, and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of any of these alternate projects and believe that each holds considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include

incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Patricia Reynolds
6468 Barranca Dr
Riverside, CA 92506
preynolds6@gmail.com

Letter I-945

Patricia Reynolds
March 10, 2023

I-945.1 This comment letter is Form Letter B –Air Quality with the addition of: "I have lived in Riverside for over 60 years, am a current resident of Canyon Crest, as well as an active community member. It has come to my attention that the EIR for the JPA warehouse development is seriously flawed." The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter B Response.

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From: Rattana Chiek <rchiek@gmail.com>
Sent: Friday, March 10, 2023 4:22 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life

1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Rattana Chiek
20222 Dayton Street
Riverside, CA 92508

Letter I-946

Rattana Chiek
March 10, 2023

I-946.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Rattana Chiek <rchiek@gmail.com>
Sent: Friday, March 10, 2023 4:24 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its

concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed

Thank you for allowing me to provide comments on this project.

Sincerely,

Rattana Chiek
20222 Dayton Street
Riverside, CA 92508

Letter I-947

Rattana Chiek
March 10, 2023

I-947.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Rattana Chiek <rchiek@gmail.com>
Sent: Friday, March 10, 2023 4:26 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan

consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Rattana Chiek
20222 Dayton Street
Riverside, CA 92508

Letter I-948

Rattana Chiek
March 10, 2023

I-948.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Rose Cook <RRaeCook@outlook.com>
Sent: Friday, March 10, 2023 3:32 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: DEIRComments_RRC.pdf

Dear Mr. Fairbanks:

Please see attached my comments on the Draft EIR. I-949.1

Thank you,
Rosamonde Cook

March 10, 2023

Mr. Dan Fairbanks, AICP
Planning Director
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500 foot range of residential homes. The draft EIR does not properly analyze the Project's Biological Resources, Section 4.3. I-949.2

I have a Ph.D. in Ecology from UC Davis and more than 20 years experience in biological monitoring applied to the conservation of biological diversity. Most recently, I worked for 11 years as a Lead Biologist and Data Manager for the Biological Monitoring Program of the Western Riverside County Multiple Species Conservation Plan (MSHCP). The MSHCP is administered by the Western Riverside County Regional Conservation Authority (RCA). The Biological Monitoring Program conducts surveys and monitoring of 146 rare and endangered plant and animal species on conserved lands throughout western Riverside County. My resume and publications list are attached. I-949.3

My comments reflect documents available publicly on the March JPA website. These documents include: I-949.4

- Draft West Campus Upper Plateau Project Environmental Impact Report, State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al.), 2022
- General Plan of the March Joint Powers Authority[1], assumed 1999 date – last updated 2/17/2022 (General Plan, 1999)
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

Background

Special-status plant and wildlife species (defined on Page 4.3-6, EIR) were evaluated for potential to occur in the Study Area. The EIR defines special-status plant species as those that are: (1) recognized as endangered or threatened in the context of the California Endangered I-949.5

Species Act (CESA) or the federal Endangered Species Act (FESA); (2) considered rare, endangered, or threatened by the CDFW or local government agencies, or (3) considered rare, threatened, or endangered in California by the California Native Plant Society.

Special-status wildlife species are defined as: (1) endangered or threatened wildlife species recognized in the context of CESA and FESA; 2) California Species of Special Concern (SSC) and Watch List (WL) species as designated by CDFW; and (3) mammals and birds that are fully protected species as described in California Fish and Game Code Sections 4700 and 3511.

The potential for special-status species to be present in the Study Area was assessed through a process that first identified all special-status species that have a documented occurrence within the geographic vicinity of the Study Area (i.e., Project vicinity), defined as including the Study Area and all lands up to three miles from its boundaries. Key database searches were made of the California Natural Diversity Database (CNDDB), administered by the CDFW Biodiversity Data Branch, the California Native Plant Society's Electronic Inventory, and the US Fish and Wildlife Service's IPaC Database.

The resulting species lists were refined using results of general field surveys that were conducted over two days in the summer of 2021, along with knowledge of species habitat associations, and the presence of habitats within the Study Area. Targeted protocol surveys were conducted for all federal and state listed endangered and threatened species determined to have a moderate to high potential of occurrence, or were detected during the general surveys.

I-949.5 Cont.

No mention is made in the EIR of the MSHCP Biological Monitoring Program's database which contains extensive records of species occurrence obtained from field surveys dating from 2004 to the present. Most MSHCP-covered species meet the definition of special-status for the EIR and are tracked by CNDDB. MSHCP data are distributed annually to the CDFW Biodiversity Data Branch and uploaded into their BIOS database. It is important to note that the BIOS and CNDDB databases are separate entities though managed by the same agency. CNDDB is in the process of incorporating occurrence records of CNDDB-tracked species from BIOS data sets, but there is a significant time lag in the process. As a result, CNDDB does not currently contain all data collected by the Biological Monitoring Program. MSHCP data are available upon request to the RCA or CDFW.

I-949.6

As part of this review, I conducted an analysis of the MSHCP Biological Monitoring Program's database, current as of March 2019, to determine if I could identify any gaps in the lists of special-status species potentially impacted by the proposed project as identified in the EIR.

I-949.7

Critical Errors and Omissions

Special-Status Plants

According to the EIR, 28 special-status plant species were found to have recorded occurrences within the Project vicinity and were assessed for potential to occur in the Study Area (Table 4.3-2, EIR). I found no records of occurrence for any additional special-status plant species in the MSHCP database. Of the 28 species, 27 were determined to have a low to no potential to occur and were omitted from further assessment.

I-949.8

This analysis is faulty because it fails to correctly match probability of occurrence with species habitat associations. One example is the failure to recognize the presence of coastal sage scrub (a habitat for some rare plant species) in the Study Area. Note that coastal sage scrub is referred to simply as coastal scrub in the table. Riversidean sage scrub, as described on Page 4.3-4, is the form of coastal sage scrub found in Riverside County. According to the EIR, the study area supports 10.98 intact and 5.47 disturbed acres of this plant community (Table 4.3-1, EIR) located "near the edges of the Study Area, in several small patches in the northern portion of the Study Area, as well as some deerweed-dominated patches near the center of the Study Area". Of the 27 species omitted from further investigation due to supposed lack of suitable habitat, 16 are known to be associated with Riversidean sage scrub. Therefore, the potential occurrence of these 16 rare plant species needs to be reassessed. I-949.9

Nine species were considered to have a low to no chance of occurrence based on lack of suitable (i.e. undisturbed) grassland habitat. Virtually all grasslands in western Riverside County are disturbed, yet rare plants are found in them. Rare plants are often sparsely distributed across the landscape, appearing infrequently and often in microhabitats linked to substrate, small scale landscape features, and other factors [2]. While many plants are known to be associated with certain broad habitat types (i.e., plant communities), it is ultimately the right combination of light, air, water, and soils that determine environmental suitability. Thus, while an association of occurrence may exist with one or more plant communities over the scale at which these are often mapped, abiotic factors and microhabitats will tend to be better predictors of occurrence on smaller scales where there may occur a mix of community types. I have personally observed Long-spined spineflower, Many-stemmed dudleya, Munz's onion, San Jacinto Valley crownscale, and Thread-leaved brodiaea growing in disturbed grassland. Therefore, the potential for grassland-associated rare plant species to occur in the Study Area needs to be reassessed and surveys need to be conducted for species determined to have a greater than low potential to occur. I-949.10

Two types of plant surveys were conducted for the EIR. One is described as a "general biological survey for plants and wildlife conducted concurrently with vegetation mapping on July 28, 2021, and August 6, 2021" (page 12, EIR Appendix D). It appears that the purpose of this survey was to develop a floristic list. However, there is no protocol included with the report and without knowing anything more about the methods used, effort involved, experience of the surveyors, it is impossible to interpret the likelihood of these surveys to detect populations of rare plants. Since rare plants are often sparsely distributed and possess more specialized habitat requirements, they are easily overlooked in general floristic surveys [3,4]. Additionally, the limitation of these surveys to the summer months precludes the likelihood of detecting rare plant species that bloom at other times of the year. Examples of such species are Munz's onion which blooms April – May and Chaparral ragwort which blooms February – May (data from the Jepson website (ucjeps.berkeley.edu). I-949.11

Another survey was conducted for summer-blooming plant species on June 6 and 7, 2022. On page 13, EIR Appendix D, it is stated that "the project site was surveyed for special-status plants, including Smooth tarplant and Paniculate tarplant. All suitable habitat within the project site was walked and assessed for the presence of special-status floral species." Did these surveys include all summer-blooming special-status plants? Or did they specifically target the two tarplant species? Again, no protocol is included with the report, so we don't know what methods were used, which habitats and microhabitats were searched, level of effort, and experience level of surveyors. I-949.12

Detectability of rare plants is notoriously low, contributing to underestimates of occurrence and reliability of survey data. Sources of error include differences in morphology, life-form, patch size, survey effort, and more. For these reasons, individual surveys should target one or a small number of species with similar habitat requirements to improve detectability. It appears highly unlikely that the surveys conducted for this study were adequate to achieve a reasonable level of detectability of the suite of special-status plants identified as potentially occurring. I-949.13

One species, the seriously threatened Smooth tarplant, was found to have a moderate potential to occur within the study area but was undetected in the summer-blooming plant surveys. Since plants can remain dormant in the seed bank, often for many years, it is very difficult to rule occurrence out. Generally, surveys over many years are needed to conclude a dormant population is unlikely present. Smooth tarplant grows in moist soils. According to Jepson (ucjeps.berkeley.edu), this species is found in open, poorly drained flats, depressions, waterway banks and beds, grassland and disturbed sites. Southern California was in a state of severe to exceptional drought throughout all of 2022. For all these reasons, it cannot be concluded that the species is absent from the study area. I-949.14

What needs to be done:

1) Recognize the presence of coastal sage scrub in the form of Riversidean sage scrub in the Study Area
2) Expand search for special-status species within the Project vicinity using the most current version of the MSHCP database.
3) Reassess potential occurrence of all species assessed with low to no potential occurrence recognizing the presence of coastal sage scrub and ability of disturbed grassland to support many of the rare plant species in Table 4.3-2.
4) Include survey protocols in the EIR, Appendix D. Protocols should include methods, habitats and microhabitats searched, level of effort, and experience of surveyors.
5) Conduct a new series of field surveys designed to detect special-status species in all potentially suitable habitat and during the blooming periods of all species concerned.
6) Conduct targeted surveys for Smooth tarplant and any other species deemed to have a greater than low occurrence potential in the Study Area during years with adequate rainfall. Conduct repeat surveys to cover the blooming period.
7) Consider Smooth tarplant to be present unless not detected in targeted surveys and avoid disturbance of habitat until absence is confirmed.
1) Conduct impacts analyses for any additional species with greater than low potential occurrence.

I-949.15

<u>Plant Communities</u>

Riversidean sage scrub is not considered sensitive globally or in the state of California and no mitigation is required. Nonetheless, the EIR stipulates under MM-BIO-8 that impacts on Encelia scrub, flat-topped buckwheat, and Riversidean sage scrub to be mitigated at a 1:1 ratio, and Project impacts on disturbed Riversidean sage scrub to be mitigated at a 0.5:1 ratio through the purchase of credits at an approved mitigation bank. It further states that these mitigation ratios are appropriate “because these vegetation communities are not considered sensitive under CEQA and do not support special-status species within the Specific Plan Area.” However, as discussed above, the assessment for rare plants is probably inadequate to conclude that Riversidean sage scrub does not support special-status plant species. The EIR should re-evaluate the value of Riversidean sage scrub to potentially occurring rare plants and consider mitigating any loss at a higher ratio. I-949.16

Wildlife

According to the EIR, 24 special-status wildlife species were found to have recorded occurrences within the Project vicinity and were assessed for potential to occur in the Study Area (Table 4.3-3, EIR). I found an additional 10 species in the MSHCP database, all of which are either State Threatened (ST), Species of Special Concern (SSC), or Watchlist Species (WL). These include Bell's Sparrow (WL), Ferruginous hawk (WL), Golden eagle (WL, Fully Protected), Grasshopper sparrow (SSC), Merlin (WL), Peregrin falcon (Fully Protected), Prairie falcon (WL), Southern California rufous-crowned sparrow (WL), Swainson's hawk (ST), and Yellow-breasted chat (SSC). All of the raptor species and Bell's Sparrow are also federal Bird Species of Concern. I-949.17

I also found records of another five species covered by the MSHCP in the Project vicinity, including Bobcat, Coyote, Long-tailed weasel, Downy woodpecker, and Turkey vulture. These species are not special-status as defined in the EIR; however the EIR clearly states (Page 4.3-33, EIR) that the significance criteria used to evaluate the Project's impacts related to biological resources are based on the 2022 March JPA CEQA Guidelines. Accordingly, a significant impact related to biological resources would occur if the Project would:

"BIO-1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service." I-949.18

Since the MSHCP is a regional conservation plan, the language in BIO-1 suggests that the guidelines would cover all MSHCP-covered species as well as any federal Bird Species of Concern. In fact, the definition of special-status species (Page 4.3-6, EIR) includes species that are considered rare, endangered, or threatened by "local government agencies" which would presumably include the RCA which administers the MSHCP.

What needs to be done:

2) Expand the definition of special-status species to include MSHCP-covered species and federal Bird Species of Concern as per BIO-1 impact threshold in the 2022 March JPA CEQA Guidelines.
3) Expand search for special-status species within the Project vicinity using the most current version of the MSHCP database.
4) Reassess potential occurrence of additional special-status species using including additional field surveys.
5) Conduct any necessary impacts analysis. I-949.19

Other Errors and Omissions

The habitat description for the Tricolored blackbird is incomplete. The species is well documented to use a wide variety of upland plant species for nesting, including hoary nettle which is present in the Study Area. With the plentiful grassland also present, the site could potentially support a breeding colony. I-949.20

What references were consulted for habitat preferences of special-status plants (Table 4.3-2) and animals (Table 4.3-3)? The Jepson Manual is the preferred source among botanists in California but it appears that another reference was used. I-949.21

The species accounts in Appendix D need to be better referenced. It is hard to evaluate the accuracy of the analysis presented without confidence in the foundational information. I-949.22

Mitigation

Burrowing Owls

The EIR (Page 4.3-37) states: “Direct impacts to burrowing owl would be avoided and minimized through implementation of mitigation measure MM-BIO-5A, which requires pre-construction surveys, establishment of exclusion buffers around occupied burrows or burrow complexes (buffer width is dependent upon breeding versus non-breeding season), and burrowing owl specific monitoring throughout construction to ensure full avoidance of owls.”

“Should it be determined that full avoidance of occupied burrowing owl burrows or burrow complexes is not possible, MM-BIO-5B requires preparation of a Burrowing Owl Relocation and Mitigation Plan that would include methods for passive relocation; description of surrounding suitable habitat conditions; monitoring and management requirements for replacement burrow sites in coordination with CDFW; reporting requirements; and compensatory mitigation, if required by CDFW.” I-949.23

“With implementation of MM-BIO-5A and MM-BIO-5B, direct impacts to burrowing owl would be less than significant with mitigation incorporated.”

Any disturbance of Burrowing owls or their burrows, whether breeding or over-wintering should be considered significant. Passive relocation alone has been shown to be a failure, leading to complete abandonment of occupied sites and death of “relocated” owls. This is due in part to the fact that few burrows are actually suitable for owls. Burrowing owls in the west do not excavate their own burrows but depend on burrowing mammals to do this. Burrows must meet suitable conditions for owls with respect to depth, slope, drainage, number of openings and possibly other factors, which means owls may not be able to simply move to another burrow or burrow system even if it looks suitable to us. Passive relocation may be most successful with the proper provision of artificial burrows [5]. I-949.24

The EIR should:

1) Ensure passive relocation provides for suitable arrays of artificial burrows in a plan approved by CDFW.
2) Address the mechanisms and sources of funding that will continue to protect burrowing owls and their burrows on site after completion of the Project or post-2025 when the March JPA sunsets.

Coastal Whiptail and Orange-throated Whiptail

The EIR (Page 4.3-39) states: “Potential direct mortality of coastal whiptail, orange-throated whiptail, and western yellow bat could occur during construction activities and would be considered a significant impact requiring mitigation to reduce impacts on the species to a level below significant. Impacts to these species would be reduced to less than significant by implementation of MM-BIO-1, which requires a biologist flush sensitive species from suitable habitat immediately prior to initial ground disturbing activities, and daily biological monitoring I-949.25

during the initial vegetation removal and during any ground disturbing activities that result in breaking of the ground surface. In addition, the measure calls for regular random checks at least once a week, after the initial ground disturbance phase, and sets forth best management practices (BMPs) to reduce impacts to these special-status species. With the implementation of the mitigation measures described in MM-BIO-1, impacts to coastal whiptail, orange-throated whiptail, and western yellow bat would be less than significant with mitigation incorporated."

The EIR must explain how flushing whiptails from their habitat immediately prior to ground disturbing activities is beneficial mitigation. A whiptail cannot travel far on its own in such a short period of time. How can direct harm be avoided? Why is flushing favorable to relocation to a safer location?

I-949.25

Western Yellow Bat

Little is known about the habitat requirements and behavior of this species. The EIR must recognize that the impacts on individuals of flushing from a daytime roost are unknown, unless evidence to the contrary is found. Otherwise, any disturbance must be considered unmitigated.

I-949.26

Interagency Review

I request all revisions be evaluated by the CDFW.

I-949.27

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[1] https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf

[2] Nelson, J.R. 1987. Rare Plant Surveys: Techniques for Impact Assessment. In: T.S. Elias (ed.), Conservation and Management of Rare and Endangered Plants. Sacramento, California.

[3] Guoke C., Keri M., and Ma K., 2009. Factors Affecting Detection Probability in Plant Distribution Studies. Journal of Ecology 97: 1383-1389.

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[5] Trulio, L.A. 1995. Passive Relocation: A Method to Preserve Burrowing Owls on Disturbed Sites. Journal of Field Ornithology 66:99-106.

Rosamonde Cook

Home: (951) 787-8767 Cell: (951) 236-7094
RRaeCook@Outlook.com linkedin.com/in/rosamonde-cook-505b5139

Education

Professional Certificate in Data Science, University of California, Riverside. 2020

Ph.D., Ecology. University of California, Davis. 1997

M.S., Ecology. University of California, Davis. 1991

B.A., Ecology. Behavior, and Evolution, University of California, San Diego. 1984

Positions

Lead Biologist and Data Manager **March 2008 – April 2019**

Biological Monitoring Program, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Riverside, California.

Significant contributions to the largest Habitat Conservation Plan in the United States, covering 1.2 million acres and 146 species of plants and animals in a U.S. biodiversity and endangered species hotspot.

- Lead author of the Program's Long-term Monitoring Strategy, a key implementing document and primary deliverable for a State Wildlife Grant (SWG) that funded the first eight years of the Program.
- Lead role in an interagency adaptive management project to enhance and restore essential habitat for a threatened land bird and associated avian species.
- Reviewed and commented on draft land management plans, species status assessments. ESA and CESA listing petitions, and project draft environmental impact statements.
- Engaged with a wide variety of audiences including land managers, academic researchers, other federal and state agency personnel, and the public.
- Participated in formal public meetings, staff meetings, and interdisciplinary team meetings relating to complex natural resource issues and studies.
- Developed project plans and monitoring protocols. Trained and supervised staff and volunteers in field methods and species detection. Prepared technical reports and journal articles.
- Participated in field surveys for a wide range of plant and animal species and vegetation communities covered by the MSHCP.
- Full stack database developer. Designed, built, and administered a centralized relational database for the input, storage and retrieval of complex biological, physical, and habitat survey data for terrestrial and aquatic organisms and vegetation communities following best practices and data design principles.
- Programed custom user interfaces using Visual Basic for Applications (VBA) and SQL following best practices and user input.

- Created mobile data entry applications for tablet (MS Access, Survey 1-2-3), smart phone (Survey 1-2-3), and PDAs (Pendragon). Created applications to reformat and upload field-collected data.
- Balanced high demand coordination of data management tasks and pre-project preparation with multiple project team leaders.
- Developed and implemented data quality assurance and quality control procedures for use throughout the data lifecycle. Developed policy and procedures for data sharing and handling of sensitive data.

Data Manager **April 2004 – February 2007**

U.S. National Park Service, Vital Signs Inventory and Monitoring Program, Sierra Nevada Network. Three Rivers, California.

Contributed to the Network's long-term monitoring plan and lead role in all aspects of data management for the Sierra Nevada Network Vital Signs Monitoring Program.

- Developed a standardized relational database template for inventory and monitoring, adopted as a program standard at the national level.
- Led the development of the Network's data management plan, ranked in the top tier of 32 network plans and adopted as the model for a national data management plan.
- Co-authored the Network's long-term monitoring plan.
- Provided data management support and database development to park staff (Natural Resources Management, Concessions, GIS) and USGS partner scientists.
- Prepared detailed, stepwise users-manuals and standard operating procedures for natural resource databases including instructions on entering, checking, querying, summarizing, reporting, and archiving data.

Postdoctoral Research Associate **April 2001 – November 2002**

University of Connecticut, Department of Marine Biology and the National Oceanographic and Atmospheric Administration (NOAA) Northeast Underwater Research Technology and Education Center. Groton, Connecticut.

Applied ecological concepts and eco-regional conservation planning approaches to large-scale marine conservation problems using long-term biological monitoring data.

- Demonstrated the applicable use of mathematical optimization and bottom trawl survey data (NOAA Fisheries Science program) to the design of protected area networks for the New England groundfish fishery.
- Analyzed and evaluated alternate spatial models proposed for habitat closures in updates to the New England Fishery Management Council's Groundfish Management Plan.
- Participated in the NOAA expedition Deep East, an exploration of the marine canyons and seamounts on the Northeast Continental Shelf. Data contributed to the decision to designate the Northeast Canyons and Seamounts National Monument by President Obama.

- Consulted with US and Canadian non-governmental organizations to develop a data-driven marine bioregional conservation prioritization and planning framework for the eastern continental shelf of North America.
- Developed a bioregional classification for the continental shelf of Northeastern North America based on physical and biological parameters.
- Modeled benthic sediment data from side-scan sonar surveys to assess optimal representation of course-scale seafloor habitats in Stellwagen Bank National Marine Sanctuary.

Wildlife Biologist **February 2000 – November 2000**

Hawks Aloft Inc. Albuquerque, NM.

- Field research on reproductive success and prey selection of nesting Ferruginous hawks (*Buteo regalis*) in central New Mexico. With the University of New Mexico Museum of Natural History.
- Aerial and ground surveys for nesting hawks and Gunnison's prairie dog colonies, monitored active nests, collected and analyzed prey remains.
- Aerial surveys and monitoring Golden eagle (*Aquila chrysaetos*) nests in an active oil field in north-eastern New Mexico.
- Identified and mapped nesting sites of raptor species and Common raven (*Corvus corax*) at the Navajo coal mine in Farmington, New Mexico.

Postdoctoral Fellow **December 1996 – November 1999**
Colorado State University, Department of Fish, Wildlife, and Conservation Biology. Fort Collins, Colorado.

Lead role in the development of a large geo-spatial database (GIS) and decision support tool for mapping and analysis of species diversity (vertebrates and butterflies) in Arizona and New Mexico. In support of a regional assessment of livestock grazing impacts on ecosystem integrity and species viability on U.S. Forest Service lands in the American southwest.

- Developed project goals and objectives in collaboration with an interdisciplinary team of government and academic scientists.
- Researched, acquired, standardized, and integrated numerous biological datasets and physical/habitat/vegetation spatial data layers from a wide variety of sources.
- Hired, trained, and supervised a GIS analyst and student support staff. Supervised data entry and digitization of more than 50,000 species occurrence records.
- Wrote grant proposals and helped obtain multiple years of funding. Wrote reports and delivered formal and informal presentations.

Member of the Biodiversity Committee of the Forest Sector, National Assessment Synthesis Team, Global Climate Change Impacts on the United States. U.S. Global Change Research Program.

- Spatial statistical analysis of climate change model data to assess relative impacts of federal protected and non-protected areas. Used mixed general linear models to account

for spatial autocorrelation.

- Conducted a literature review on the impacts of climate change on species, natural communities, and biomes. Co-authored a landmark publication and report to Congress on projected impacts of climate change in the United States.

Additional Experience

Database Design and Applications Development

- Independent Contractor, U.S. Geological Survey Climate Change Program. Forest demographics monitoring. MS Access.
- Independent Contractor, U.S. National Park Service, Yosemite and Sequoia/Kings Canyon National Parks. Multiple projects: bear management, invasive plants monitoring and management, natural resources project management, water quality and stream flow monitoring. MS Access.
- Environmental Services Intern, California Department of Parks and Recreation, Natural Heritage Section. Cataloguing aerial photos, tracking wildlife management projects in the parks. DBase III, Visual DBase.

Research

- Independent Contractor, Environmental Defense, Boston, Massachusetts. Alternatives for optimal representation of seafloor habitats in Stellwagen Bank National Marine Sanctuary.
- Independent Contractor, Conservation Law Foundation, Boston, Massachusetts. Marine ecosystem conservation for New England and eastern Canada: A science-based approach to the identification of priority areas for conservation.
- Independent Contractor, U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Office of National Marine Sanctuaries. Changes over time in mean body length of commercially harvested demersal species in the New England groundfish fishery.
- Independent Contractor, NOAA Southwest Fisheries Science Center, La Jolla, CA. Developed a method for rapidly assessing relative caloric content of marine fish prey species of the California sea lion.
- Laboratory Assistant, Scripps institute Oceanography, La Jolla, CA. Cultivated, harvested, and counted single cell marine algal species under the microscope.
- Senior Project, University of California, San Diego. Conducted a pedigree analysis of captive populations of Asiatic wild ass (*Equus hemionus)*. Discovered evidence of inbreeding depression.

Teaching

- Guest Lecturer. Wildlife Fundamentals, Colorado State University, Department of Fish, Wildlife, and Conservation Biology.
- Teachers Assistant, University of California, Davis. Led discussion sections and labs for undergraduate courses in biology, zoology, and ecology. Mentored students in report writing. 4 quarters.

- Assistant Instructor, University of California, Davis. Led discussion sections for an undergraduate course in oceanography. 1 quarter.
- Teachers Assistant, University of California, San Diego. Led laboratories and mentored students in BASIC computer programing. 4 quarters.

Advanced Training and Skills

Software and Programming

Python, R, SAS, SPlus, ArcGIS, Survey 1-2-3, MS Access, MySQL, SQL Server, Visual Basic Applications (VBA), MS Excel, Fortran.

Modeling Concepts

General Linear Models, Logistic Regression, Classification, Decision Trees, Random Forest, Neural Networks, Spatial Analysis and Autocorrelation, Ecological Null Models, Monte Carlo Simulation, Simulated Annealing.

Publications

Journal Articles

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Cook, R.R., C.H. Flather, and K.R. Wilson, 2000. Faunal Characteristics of the Southern Rocky Mountains: Implications for Biodiversity Conservation. General Technical Report RMRS-GTR-58. U.S. Department of Agriculture Forest Service, Rocky Mountain Research Station, Fort Collins, Colorado. 55 pp.

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Other Professional Contributions

BirdLife International. 2020. *Agelaius tricolor.* The IUCN Red List of Threatened Species 2020: e.T22724196A180644814. https://dx.doi.org/10.2305/IUCN.UK.2020-3.RLTS.T22724196A180644814.en.

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Balcombe, J. 2016. What a Fish Knows: The Inner Lives of our Underwater Cousins. Scientific American / Farrar, Straus and Giroux.

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Clipperton, N. 2018. A Status Review of the Tricolored Blackbird in California. California Department of Fish and Wildlife. Sacramento, CA. (external peer review)

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Shuford, W.D. 2014. Patterns of distribution and abundance of breeding colonial waterbirds in the interior of California, 2009–2012. A report of Point Blue Conservation Science t California Department of Fish and Wildlife and U.S. Fish and Wildlife Service Region 8.

National Assessment Synthesis Team, 2000. Climate Change Impacts on the United States: The Potential Consequences of Climate Variability and Change. U.S. Global Change Research Program. Cambridge University Press, Cambridge, U.K.

Letter I-949

Rosamonde Cook, Ph.D.
March 10, 2023

I-949.1 This comment is introductory and refers to an attached letter. The comment does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-949.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a buildout scenario of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. As this comment does not raise any specific issues with respect to the content and adequacy of environmental analysis within the Draft EIR, no further response is provided.

I-949.3 This comment and the attached resume and publications list summarize the commenter's subject matter expertise. As this comment does not raise any specific issues with respect to the content and adequacy of the environmental analysis included in the Draft EIR, no further response is provided.

I-949.4 This comment summarizes the documents reviewed by the commenter. As this comment does not raise any specific issues with respect to the content and adequacy of the environmental analysis within the Draft EIR, no further response is provided.

I-949.5 This comment is a reiteration of information presented in the Project Biological Technical Report, included as Appendix D-1 to the Draft EIR. As this comment does not raise any specific issues with respect to the content and adequacy of the environmental analysis within the Draft EIR, no further response is provided.

I-949.6 This comment requests consideration of the MSHCP database. Though database searches are one part of the habitat assessment process and can be very informative, the equally and perhaps more important element is the assessment performed by biologists on the ground using their knowledge of local species and habitat associations as well as overall knowledge of species biogeographic distribution in the region to assess the potential for special-status species on any given project site.

Regarding what databases were consulted as part of the desktop review, Natural Community Conservation Plan (NCCP) biological monitoring, such as MSHCP field surveys, is typically performed on lands already conserved under the NCCP so has a slightly narrower focus than databases like the California Natural Diversity Database (CNDDB), which was reviewed as part of the project research. Since, as noted by the commenter, MSHCP data is conveyed to CNDDB, the CNDDB would typically include most NCCP biological monitoring location data for special-status species.

Based on this comment, the Western Riverside County MSHCP Species Observations Database on CDFW BIOS was reviewed for a three-mile radius surrounding the Project site on March 2, 2023. No special-status wildlife species were recorded within this database for a three-mile radius around the Project site. Please note that species mapped within and near Sycamore Canyon Wilderness Park and Box Springs Mountain Reserve are not considered to be special-status species under this analysis. The

observations included coyote, granite spiny lizard, turkey vulture, Wilson's warbler, Lincoln's sparrow, and MacGillivray's warbler. While these species are Covered Species under the MSHCP, they are not considered to be special-status species. Please note that a discussion regarding whether an MSHCP Covered Species would be considered special-status is included in Response I-949-18, below.

I-949.7 This comment describes the commenter's MSHCP search. As this comment does not raise any specific issues with respect to the content and adequacy of the environmental analysis within the Draft EIR, no further response is provided.

I-949.8 This comment summarizes the commenter's own research, in which she found no records of special status plants not included in this analysis. As this comment does not raise any specific issues with respect to the content and adequacy of the environmental analysis within the Draft EIR, no further response is provided.

I-949.9 This comment asserts that the Draft EIR failed to recognize the presence of coastal sage scrub when assessing suitable habitat for 16 rare plant species that are associated with coastal sage scrub. These 16 species may be found in suitable coastal scrub habitats.

Riversidean sage scrub, disturbed Riversidean sage scrub, and flat-topped buckwheat are recognized as forms of coastal scrub habitat within the Draft EIR and Project Biological Technical Report (Appendix D-1). Table 4.3-2, Special-Status Plant Species with Potential to Occur Within the Upper Plateau Project Study Area, of the EIR has been updated to clarify this. When assessing the potential for these species to occur on the Project site, the original analysis did take the presence of on-site scrub habitats into account. The scrub habitats on-site are smaller areas of buckwheat-dominated scrub and Encelia-dominated scrub and are generally not diverse, well-developed coastal scrub habitats.

Rare plant species that are associated with coastal sage scrub do not occur within all coastal sage scrub. Many other biotic and abiotic conditions determine whether a rare plant may be found in any given locality, even if the proper habitat type is present. The determination of low potential to occur for these 16 species, is not solely based on lack of suitable vegetation communities, but is based on many other factors, including disturbance level, previous land uses, presence of associated plant species, and recorded occurrences. Please also note that the Draft EIR and Project Biological Technical Report assert that these species have a low potential to occur, meaning the probability of occurrence on site is low, and do not imply that there is no possibility of species occurrence.

I-949.10 This comment raises concerns regarding the analysis of grassland-associated rare plant species. Section 4.3, Biological Resources, of the Draft EIR and the Biological Technical Report assess the potential for special-status plant species to occur and did not solely base these assessments on the presence or absence of particular vegetation communities but took into account the biotic and abiotic conditions described by the commenter. It is acknowledged that undisturbed grasslands are virtually non-existent in this region due to many factors, including the pervasive spread of non-native grasses and forbs, and that rare plant species can persist despite these disturbances under certain conditions. Although nearly all grasslands are disturbed and contain non-native species, the relative disturbance level can vary greatly, from indirect disturbances due to adjacent land uses, such as presence of sparse non-natives or trash, to direct disturbances, such as historic land modification by scraping or grading. Rare plants are typically found in non-native grasslands where the annual grasses themselves are the primary disturbance, e.g., habitats that were native that have been invaded by non-native grasslands

but still maintain intact soils, with many occurring in particular soil types like clay or alkaline soils. The grasslands on the proposed Project site are heavily disturbed and profoundly dominated by non-native species with considerable historic land alterations. The land was previously utilized for military activities during which many dirt roads were created through the grasslands and vehicles appeared to have also driven off-road. Such heavy disturbance can reduce the likelihood of rare plant presence because of direct impacts to the soil, which can affect the seed bank, and the introduction and spread of non-native species. Most rare plants are not tolerant of heavy disturbance, which has contributed to their modern-day rarity. Please also note that each species' distribution/range, known habitat 'preferences', and on-site habitat quality/disturbance level were all taken into account during habitat assessments; each species' potential for occurrence is based on the totality of these factors rather than only the disturbed nature of the habitat on-site.

The assessments of the potential for special-status plant species to occur were conducted using the best available data while taking into account the specific conditions on the Project site. Each of the species listed in the comment has a low potential for occurrence on-site, thus impacts are not expected.

I-949.11 This comment questions the protocol used for the plant surveys. The general biological survey is not a focused plant survey, per se, but an overall analysis of habitats occurring on-site and inventory of species observed at the time of the survey. There is no formal protocol for general surveys; the purpose of the general biological survey is to create an overall assessment of habitat types that occur on-site and to perform habitat assessments for special status species (e.g., determine if a given special-status species has potential to occur on-site). The purpose of the survey is not to prepare an exhaustive species list, but all plant species observed during the general biological survey are recorded as part of the survey. The general biological survey was led by Jim Rocks, who holds a master's degree in biological science and has over 30 years of experience in southern California biology, specializing in botany. The general biological surveys were conducted on July 28, 2021, and August 6, 2021 by traversing the Project site on foot and closely examining all unique areas of habitat. All plant species encountered were identified to the species or subspecies level.

It is acknowledged that general biological surveys did not occur during all seasonal windows, which are highly variable in southern California. However, the general biological surveys allow experienced biologists to assess the potential for rare species that may not be visible during the actual general survey. The information collected during the general biological survey allowed for classification of the land into distinct vegetation communities and evaluation of the potential for special-status plants to occur on site. Based on the initial general survey, it was determined that smooth tarplant had a potential to occur on-site and rare plant surveys were performed for this species. Per Table 4.3-2 in Section 4.3, Biological Resources of the Draft EIR, and Table 6 of the Biological Technical Report (Appendix D-1), Chaparral ragwort (CRPR 2B.2) was determined to have a low probability for occurrence and Munz's onion (FE; ST; CRPR 1B.1) was determined to have a very low probability for occurrence on-site. Minor additional details have been added to Table 4.3-2 of the EIR and Table 6 in Appendix D-1 to further elaborate on these species and on-site conditions.

This data provides the necessary information for decision makers to understand the environmental consequences of the proposed Project. In addition, although general and rare plant surveys occurred in June, July, and August, note that biologists were on site for various special-status species surveys throughout the entire year (i.e., at least once during each month of the calendar year) and recorded any encountered plant species not previously detected.

I-949.12 This comment questions the plants surveyed and the protocol used. All Project survey methods are described in Section 2 of the Biological Resources Technical Report, included as Appendix D-1 to the Draft EIR. During the surveys for smooth and paniculate tarplant, complete plant compendiums were recorded by qualified botanists, meaning that any observed summer-blooming special-status species would have been recorded. However, focused surveys did specifically target smooth tarplant in terms of approximate timing since this was the only CRPR 1 or 2 plant species determined to have moderate or high potential to occur on site.

The smooth tarplant rare plant survey was led by Ryan Meszaros, who holds a bachelor of science degree in botany and has nearly 20 years of experience in southern California field biology, with a focus on botany. Surveyor names have been added to the Biological Technical Report. Additionally, the discussion of the survey protocol has been expanded upon within the Project Biological Technical Report to include that surveyors walked parallel transects which were spaced to allow for 100% visualization of ground cover.

I-949.13 This comment raises concerns that the plant surveys did not detect rare plant species. Focused surveys were only conducted for tarplant as smooth tarplant was the only CRPR 1 or 2 plant species determined to have moderate or high potential to occur on site. Focused surveys were not conducted for any CRPR 1 or 2 species determined to have low or no potential for occurrence because no impacts are anticipated to these species. Additionally, no federally or state listed plant species were found to have moderate or high potential to occur on the proposed project site, therefore focused surveys for such species were also not conducted. Please refer to Response I-949-11, above.

I-949.14 This comment questions the determination that smooth tarplant is not present on site. Focused surveys for paniculate tarplant, a CRPR 4.2 species, and smooth tarplant, a CRPR 1B.1 species, were conducted during appropriate seasonal windows by qualified biologists experienced in identifying both species. While it is recognized that smooth tarplant is rarer than paniculate tarplant, it is not listed as threatened under CESA.

Although 2022 was a drought year in Riverside County, there were areas of the proposed Project site that supported conditions suitable for this species to bloom, including near drainages and in/around ponded areas examined during wet season vernal pool branchiopod surveys. During a drought year, it would be unlikely to find a large population of smooth tarplant in bloom as abundance is correlated with rainfall; however, drought conditions do not preclude all individuals in a population from blooming. Tarplant surveys were conducted to allow for 100% visualization; therefore, small numbers of individuals would have been detected, if present.

In addition, smooth tarplant was observed in Riverside County in 2022. It was also recorded annually from 2000 through 2018 and Riverside County experienced drought conditions in the majority of these years.

There is a smooth tarplant population at Sycamore Canyon Wilderness Park north of the Project site. Only one other record of smooth tarplant was located within the 3-mile study area. This record is from a collection made in 1995 from land east of the proposed Project site. There are no additional records of smooth tarplant within a 3-mile radius of the Project site. Other recent surveys for smooth tarplant performed in similar habitat within the vicinity of the Project site were conducted during non-drought years and were also negative for smooth tarplant.

No revisions or updates to the results of the 2022 tarplant survey are required.

I-949.15 This comment provides a list of tasks the commenter would like completed based on the above comments. These tasks are not necessary to adequately analyze the environmental impacts of the proposed Project in terms of compliance with CEQA. Each recommended task in this list pertains to a comment above, for which detailed responses to the concerns raised by the commenter are provided. Please refer to the responses to comments above.

1) With regard to recognizing the presence of coastal sage scrub, Riversidean sage scrub is recognized as a form of coastal scrub habitat. When assessing the potential for these species to occur on site, the original analysis did take the presence of on-site scrub habitats into account. It was not the intent to assert that coastal scrub is not present but instead meant that the coastal scrub habitat that is present is unsuitable. Language within Section 4.3, Biological Resources, of the EIR and the Biological Technical Report (Appendix D-1) has been updated. Please see Response I-949.9, above.
2) As noted in Response I-949-6, above, the MSHCP database has been reviewed. No additional special-status plant species were documented within the Project vicinity.
3) With regard to the potential occurrence of species assessed with low to no potential occurrence, please see Responses I-949.10 and I-949.11, above.
4) Please see Response I-949.12, above., regarding survey protocols.
5) As discussed in the Responses above, no new field surveys are required.
6) As discussed in the Responses above, no new field surveys are required.
7) The surveys for smooth tarplant were accurate, and the absence of smooth tarplant was documented. Please see Responses I-949.13 and I-949.14, above.
8) The Draft EIR and Biological Technical Report (Appendix D-1) conclusions regarding special-status plant potential to occur are sound, and new analyses are not necessary.

I-949.16 This comment reiterates the mitigation ratios proposed within the Project Biological Technical Report (Appendix D-1) and requests consideration of higher mitigation ratios for Riversidean sage scrub impacts. This comment was based on the adequacy of the special-status plant assessments, which are substantiated in the Responses above. The statement that 'the assessment for rare plants is probably inadequate' is highly speculative and no substantial evidence has been provided justifying this claim. In addition, the mitigation ratios proposed are based on the precedent set for mitigation in the area by previously approved projects. As such, no revisions are required in response to this comment.

I-949.17 This comment lists additional wildlife species to be analyzed. Although not observed during surveys or known from the Project vicinity, it is acknowledged that these species occur in the larger 1.26-million-acre MSHCP planning area. All special-status species that are known to occur on the Project site or that have a moderate or high potential to occur on the Project site have been analyzed in detail in Section 4.3, Biological Resources, of the EIR, as well as within Section 4 of the Biological Resources Technical Report included as Appendix D-1 to the EIR. Please see the following additional detail about the specific wildlife species identified by the commenter.

Species	Status	Habitat Description	Potential to Occur
Bell's sparrow (*Artemisiospiza belli*)	WL	Found in coastal scrub and chaparral in low, dense stands of shrubs. In winter, alkali desert scrub, and desert scrub frequently associated with Atriplex spp. in desert habitats.	**Low**. Suitable sparse scrub habitat is present on site; however, species likely would have been observed during focused coastal California gnatcatcher or least Bell's vireo surveys if present.
Ferruginous hawk (Buteo regalis)	WL (wintering)	Found in grassland, desert, and scrubland habitats and at the edges of low/moderate elevation forests.	**Low**. Suitable foraging habitat present, but species does not nest in southern California.
Golden eagle (Aquila chrysaetos)	FP; WL (nesting and wintering)	Found in mountainous canyonlands, deserts, agricultural fields, and semiopen habitats.	**Low**. Suitable foraging habitat present, but suitable nesting habitat is not present.
Grasshopper sparrow (Ammodramus savannarum)	SSC (nesting)	Found in grassland habitat and agricultural areas with little to no scrub cover and often with some bare ground.	**None**. Not known from project vicinity. Grassland on site is denser than preferred by this species.
Merlin (Falco columbarius)	WL (wintering)	Found in a wide variety of open and semi-open habitats. Primarily found in grasslands when wintering in southern California but will inhabit any habitat except dense woodland.	**Low**. Suitable foraging habitat present, but species does not nest in southern California.
Peregrine falcon (Falco peregrinus)	FP (nesting)	Found within a variety of habitats, though perennially dependent on wetlands and riparian habitats.	**Low**. Suitable foraging habitat present, but suitable nesting habitat is not present.
Prairie falcon (Falco mexicanus)	WL (nesting)	Found in desert shrubland and grasslands. Primarily forage in grassland habitats.	**Low**. Suitable foraging habitat present, but suitable nesting habitat is not present.
Southern California rufous-crowned sparrow (Aimophila ruficeps canescens)	WL	Found in mostly in sage scrub and chaparral, but also grassland habitats with scattered scrubs. Prefers open habitat with rocky slopes.	**Low**. Grasslands present on site have sparse scrubs; however rocky slopes are limited on site. Species would have likely been observed during focused gnatcatcher or vireo surveys if present.
Swainson's hawk (Buteo swainsoni)	ST (nesting)	Found in open habitats for foraging including grasslands, prairies, and sometimes pastures. Nest in solitary trees or sometimes very small groves near water.	**Low**. Suitable foraging habitat present, but species does not nest in vicinity.
Yellow-breasted chat (Icteria virens)	SSC (nesting)	Found within a variety of riparian habitats and occasionally disturbed and successional habitats.	**Low**. Suitable riparian habitat not present within the project site footprint but does occur in buffer. Species would have been likely observed during focused coastal California gnatcatcher or least Bell's vireo surveys if present.

Source: Appendix D-2

I-949.18 This comment asserts the Draft EIR should have evaluated MSHCP-covered species. The assertion that all MSHCP Covered Species are "identified as a candidate, sensitive, or special-status species" is not correct. While many MSHCP Covered Species are special-status species, some Covered Species do not meet that criterion, such as bobcat, coyote, long-tailed weasel, turkey vulture, and downy woodpecker. The MSHCP does not identify these as special-status species by including them as Covered Species. An NCCP may choose to cover, and therefore provide regional protection for, species that are not otherwise considered to have a special status. NCCPs often include such species as a precautionary measure since the 'lifetime' of NCCPs can be quite long; some species were likely included so that if they are elevated to a protected status in the future, they would be covered under the NCCP and additional documentation and implementing agreements would not be needed. The MSHCP does not provide rationale for why certain species were selected for inclusion in as Covered Species. As such, the Draft EIR addresses all special-status species that are required to be evaluated under CEQA.

Although not required under CEQA, for informational purposes, USFWS Birds of Conservation Concern (BCC) was added as an additional criterion of "special-status species" and additional information on species with this designation has been added to Table 4.3-3 of the EIR and Table 7 of the Project Biological Technical Report (Appendix D-1). Please note that USFWS BCC species were not originally included in the potential to occur tables or subsequent analysis. There is debate within the industry regarding whether USFWS BCC species meet CEQA's definition of special-status. Officially, CEQA states that a species is special-status if it is "listed as rare, threatened or endangered by the Federal and/or State governments." The official definition of BCC is "the migratory and non-migratory bird species (beyond those already designated as federally threatened or endangered) that represent our highest conservation priorities." The only additional BCC species identified as present on the Project site is Lawrence's goldfinch. Any impacts to Lawrence's goldfinch would be less than significant through the implementation of MM-BIO-8 (Upland Vegetation Communities), MM-BIO-1 (Best Management Practices), MM-BIO-7 (Nesting Bird Avoidance and Minimization Measures), as identified in Section 4.3, Biological Resources, of the EIR.

I-949.19 This comment provides a list of tasks the commenter would like completed based on the above comments. Each recommended task in this list pertains to a specific comment above, for which detailed responses to the concerns raised by the commenter have been provided, and in some cases revisions to the analysis have been made, as noted above. Note that the list provided by the commenter does not include an item 1) and instead begins with 2).

2) Please see Response I-949.18, above.
3) Please see Response I-949.6, above.
4) Additional field surveys are not required.
5) Though BCC species and all MSHCP species are not required for CEQA compliance, analysis of BCC and additional appropriate MSHCP covered species has been incorporated into the analysis for informational purposes.

I-949.20 This comment questions the habitat description for the tricolored blackbird. The habitat description presented in Table 4.3-3 of the Final EIR and Table 7 of the Project Biological Technical Report (Appendix D-1) have been revised to include grasslands; this was inadvertently omitted from suitable habitat types. The potential to occur has been updated from "none"to"low" as the on-site grasslands have low potential to support a nesting colony. This revision does not change the analysis or

conclusions of the Draft EIR. Tricolored blackbird nesting colonies are unlikely to occur on the Project site; therefore, impacts on this species are not anticipated.

I-949.21 This comment requests information regarding the plant references consulted and discusses the Jepson Manual. The Jepson Manual was one of two references consulted in preparing the special-status plant potential to occur tables within the Draft EIR and Biological Resources Technical Report. The CNPS Inventory of Rare and Endangered Plants of California was also used, which is considered to be accurate and reliable among botanists.

The following references were consulting for habitat preferences of special-status plants:

Baldwin, B. G., Goldman, D. H., Keil, D. J., Patterson, R., Rosatti, T. J. and Wilken, D. H. 2012. The Jepson Manual. Vascular plants of California (Second edition). Berkeley, Los Angeles, and London: University of California Press.

[CNPS] California Native Plant Society Rare Plant Program. 2021. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Accessed July 2021. http://www.rareplants.cnps.org

The following references were consulted for habitat preferences of special-status animals:

Poole, A., and F. Gill (eds.). The birds of North America, No. 574.

Unitt, Philip. 2004. San Diego County Bird Atlas. Proceedings of the San Diego Natural History Museum, No. 39. Ibis Publishing, Vista, CA. 644 pages.

Zeiner, D. C., W. F. Laudenslayer, Jr., K. E. Mayer, and M. White, eds. 1988-1990. California's Wildlife. Vol. I-III. California Depart. of Fish and Game, Sacramento, California.

I-949.22 This comment requests that the species accounts in the Project Biological Technical Report (Appendix D-1) include more references. The species accounts were based on peer reviewed journal articles and agency publications. Additional references have been added to the species account presented in the revised Project Biological Technical Report included in Appendix D-1 of the Final EIR in response to this comment. The references were added as in-text citations to indicate the source of the information that was already presenting in the report. Information presented in the species accounts did not change and the in-text citations do not constitute new information or change any analysis or conclusions.

I-949.23 This comment is a reiteration of text present within the Draft EIR and Project Biological Technical Report (Appendix D-1).

I-949.24 This comment requests additional mitigation for burrowing owls. As stated in Section 4.3, Biological Resources, of the Draft EIR and the Project Biological Technical Report (Appendix D-1), as well as within mitigation measure MM-BIO-5A, a pre-construction survey for burrowing owl shall be conducted prior to any site disturbance and potential impacts to the species (if present) are potentially significant. If burrowing owl are detected during pre-construction surveys, any relocation would be done only with CDFW approval. CDFW has vast knowledge concerning the conditions that lead to successful outcomes. Any necessary funding to ensure successful mitigation would be negotiated between the applicant and CDFW prior to approval of relocation plans.

I-949.25 This comment raises concerns regarding the coastal whiptail and orange-throated whiptail. As described in the analysis in both Section 4.3, Biological Resources, of the Draft EIR, as well as within the Project Biological Technical Report (Appendix D-1), impacts on these species are less than significant with incorporation of the direct mortality avoidance measure the commenter references and habitat-based mitigation. Mitigation for species impacts has been completed in part through previous base closure land conservation requirements (664 acres) and will be expanded through sage scrub habitat mitigation (13.66 acres) (orange-throated whiptail and coastal whiptail habitat) as outlined in MM-BIO-8 (Upland Vegetation Communities). The mitigation measure cited by the commenter is included exclusively in order to avoid and minimize direct mortality as much as possible during construction activities and is standard pre-construction minimization and avoidance practice.

I-949.26 This comment raises concerns regarding the western yellow bat. The habitat for this SSC species is typically riparian habitat with palm trees; however, it is acknowledged that the life history of the species is not well understood. Note also that riparian habitat suitable for western yellow bat primarily occurs outside the proposed Project footprint (and given the limited palm trees is not high quality western yellow bat habitat); with the exception of the Cactus Road extension to the east of the Project site, suitable daytime roosting habitat is not present in the Project footprint.

Please see Response I-949.25, above; potential western yellow bat species impacts have been addressed through habitat-based mitigation. The mitigation measure described in this comment is strictly to avoid and minimize direct mortality on all species that may be present in the construction area; it is not intended as a species-specific take mitigation measure. With implementation of MM-BIO-1 (Best Management Practices), impacts to the western yellow bat will be less than significant.

I-949.27 The commenter requests that all revisions be evaluated by the CDFW. This comment is acknowledged.

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Letter I-950

Rosamonde Cook, Ph.D.
March 10, 2023

I-950.1 This comment letter is a shortened version of Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Rose Cook <RRaeCook@outlook.com>
Sent: Friday, March 10, 2023 4:19 PM
To: Dan Fairbanks
Subject: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

I-951.1

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics.

I-951.2

The Aesthetics section of the draft EIR holds an arbitrary standard of significance and is especially concerning to me. I have directly experienced deception in a developer's depictions of a warehouse development's appearance before, in my University neighborhood. I saw the developer's graphics and listened to their presentations. How shocked I was to find that the warehouse that went up in my neighborhood was nothing like it was presented. Rather than a low profile building, fitting in with the slope of the land, and reaching no more than two stories, the warehouse that was built is 40 feet tall and half of it is built on a raised mound so that the whole building stands above all of the others around it. Those buildings include two-story high apartment buildings on the other side of the street, and all of the warehouses nearby in the Hunter Business Park. Why was it necessary to put up something so high that it obliterates the view of Sugarloaf Mountain to anyone living across the street? Why was it necessary to destroy the view of our beloved Mount Sugarloaf as we drove up Spruce Street into our neighborhood? It has left me bereft. I feel my neighborhood blighted by this monstrosity and betrayed by our City. What a waste. And for what? This gross, oversized structure has had a drastic impact on the aesthetics of my neighborhood, although it was determined by the developer's EIR to have less than significant impact. Maybe to them, who live in Orange County. But certainly not to us!

I-951.3

With respect for the beautiful open space that the Project proposes to replace, I have to ask, in what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development?

I-951.4

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

I-951.4
Cont.

Sincerely,
Rosamonde Cook

Sent from Mail for Windows

Letter I-951

Rosamonde Cook, Ph.D.
March 10, 2023

I-951.1 This comment is the same as the first two paragraphs of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter Response A.

I-951.2 This comment asserts that the thresholds used to evaluate aesthetic impacts are arbitrary. To the contrary, the aesthetics analysis in the EIR is based on established thresholds. Specifically, as explained in Section 4.1.4, Thresholds of Significance, the significance criteria used to evaluate the Project impacts related to aesthetics are based on the thresholds contained in Form J of the 2022 March JPA CEQA Guidelines, which mirror the thresholds in Appendix G of the CEQA Guidelines. The discretion to choose the applicable threshold rests with the lead agency – in this case, March JPA. CEQA Guidelines Section 15064(b) confirms that lead agencies may exercise their discretion on what criteria to use, and it provides that "[t]he determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data."

I-951.3 This comment discusses the visual character of other warehouse developments and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-951.4 This comment is similar to the remainder of Form Letter A – Aesthetics. The comment does not raise any new or different issues than those raised within Form Letter A. As such, in response to this comment, please see Form Letter Response A.

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From: Rose Cook <RRaeCook@outlook.com>
Sent: Friday, March 10, 2023 4:24 PM
To: Dan Fairbanks
Subject: FW: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric

vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Rosamonde Cook

Sent from Mail for Windows

Letter I-952

Rosamonde Cook, Ph.D.
March 10, 2023

I-952.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Rose Cook <RRaeCook@outlook.com>
Sent: Friday, March 10, 2023 4:31 PM
To: Dan Fairbanks
Subject: Public comment on record for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, **the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses.** The 215 freeway is already clogged all day long with trucks. It now takes two hours or more to drive from Temecula to the 215/I60 Intersection. It's terrible! The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. **How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built?**

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

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

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

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

Sincerely,
Rosamonde Cook

Sent from Mail for Windows

Letter I-953

Rosamonde Cook, Ph.D.
March 10, 2023

I-953.1 This comment letter is Form Letter G –Traffic with the following added: "The 215 freeway is already clogged all day long with trucks. It now takes two hours or more to drive from Temecula to the 215/I60 Intersection. It's terrible!" The modifications to the form letter do not raise any new or different issues. As such, in response to this comment, please see Form Letter G Response.

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From: Rosie Russell <octoberrose1@verizon.net>
Sent: Friday, March 10, 2023 11:27 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email.

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.
· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.
· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.
These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Rosie Russell
20144 Dayton Street

Letter I-954

Rosie Russell
March 10, 2023

I-954.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: robertdoty32@aol.com
Sent: Friday, March 10, 2023 6:07 PM
To: Dan Fairbanks
Subject: Comments Regarding West Campus Buildout
Attachments: Orangecrest.docx

Mr. Fairbanks,

Please see attached. I-955.1

Thanks,
Robert Walker

Subject: Meridian West Campus Buildout

To: Dan Fairbanks

14205 Meridian Parkway, STE.140

Riverside, CA 82518

Mr. Fairbanks,

My name is Robert Walker, I'm an executive level general manager of a nearby distribution center for a fortune 200 company. I recently opened a building within the March JPA. Additionally I'm a 20+ year resident of Orangecrest and a former officer in the Air Force assigned at March AFB prior to the March JPA and familiar with the west base located on now JPA land.

I want to address what I keep hearing as more warehouses benefit business, the cities and me as citizen. I manage not one but two operations covering almost a million square feet. Today the business environment for space is nil. There is simply too much space which is frankly opposite of what we hear in your meetings. As I write this letter we and other companies are looking at automation. Infact we currently use a fleet of robots for picking next up packing and finally loading. So no need for people thus little contribution to the community. Business demand is slowing as consumers have figured out that "stuff" isn't needed thanks to the pandemic. A better quality life is found in other avenues such as travel and time spent with love ones. From a pure business standpoint we contribute nothing to the community. Our jobs are low wage so most employees live with extended family, we pay little to no taxes, clog up streets and most of our staff lives outside of the Moreno Valley, Perris and Riverside areas. Actually we are not heroes but pretenders who take advantage of low educated workforce by providing bike friendly access and hours of work ranging from 4 – 12 per day. Actually it's embarrassing that I'm a part of it.

I-955.2

In an average building not more than 3 individuals earn enough to live in the area.

Facts:

1. We are attracting the working poor helping them not to advance to a better life.
2. Encourage an un-educated population.
3. Business volume underwater for two years running and getting worst.
4. Employees commuting from as far as LA County.
5. 70% of employees live outside of the area.
6. Over 13.6+ billion square feet of warehouse space in US. Do we need more?
7. Warehousing space has outpaced need and US economy growth.
8. Average hours for my buildings 20 hours per week.

9. Clogged streets and freeways.
10. Little to no benefits so strain on health care. Been to hospital lately?

Sir, more warehouses contribute nothing to this area. Instead drives the need for a quality education away, increases crime because of poverty wage and eliminates quality of life for thousands of residents. It was never my intention to look at a block warehouse or drive behind a trailer truck on the way to the market. I'm a part of this cruse but I do think too much of what once was a good thing when well thought out and placed appropriately away from residential areas was a plus. Now it's killing a life style I enjoyed and in the long run diminishes what some people called the American dream but it's nothing more than greed based on a lie of making things better. Our area is nothing more than a Motel 6 for distribution centers, stay cheap, attract the worst of society and contribute nothing.

I-955.2 Cont.

In summary based on my 30 years of logistics experience need for more distribution centers or a buildout on the west campus is not warranted. Consumers have begun the shift back to brick and mortar stores . Ecomm and retail business will be around but not flourish as it has been sold.

MARCH JPA's job is done, you replaced those jobs lost at March AFB times 10 fold now work for the people who pay taxes and built the area . Not your organization nor the developer.

Respectfully,

Robert Walker

Robert Walker

Orangecrest Resident

Letter I-955

Robert Walker
March 10, 2023

I-955.1 This comment refers to an attachment and does not raise any specific issues or concerns about the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-955.2 This comment expresses general opposition to the Project and addresses warehousing demand, automation, job generation, and traffic congestion. Overall vacancy rate in the Inland Empire is 2.9% which is historically still low and largely due to turnover in the 100,000 square feet to 250,000 square feet building size range.[2] While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. Traffic congestion is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. Nonetheless, a discussion of potential traffic impacts associated with the Project is included in Section 4.15, Transportation, of the Draft EIR, and a detailed discussion about jobs is included in Topical Response 5 – Jobs.

[2] Colliers Inland Empire Q2 2023 Industrial Report.

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From: Steve Huddleston <shudd1217@charter.net>
Sent: Friday, March 10, 2023 3:06 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email. I-956.1

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. I-956.2 I-956.3 I-956.4

Steve Huddleston

639 Burwood Ct.

Riverside CA 92506

Letter I-956

Steve Huddleston
March 19, 2023

I-956.1 The comment states that it is being provided to multiple parties and does not raise any specific issues or concerns on the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-956.2 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the Draft EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the Draft EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise concerns regarding the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

I-956.3 This comment raises general concerns about the Draft EIR's analysis of the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing impacts. Since the comment does not raise specific issues, concerns or questions about the environmental analysis in the Draft EIR, no response is required.

I-956.4 This comment requests a non-industrial alternative to the Project. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated.

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From: Shaan Saigol <shaansaigol@gmail.com>
Sent: Friday, March 10, 2023 12:29 PM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

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For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR.

Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: The Campus Approach

· Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement.

· Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental,

medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan).

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach

· Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park.

· Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.

· Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

3. Alternate plan #3: The State or County Park Approach

· Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).

· Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.

· Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.

· Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area.

Thank you for allowing me to provide comments on this project.

Sincerely,

Shaan Saigol
20872 Bakal Dr, Riverside 92508
shaansaigol@gmail.com

Letter I-957

Shann Saigol
March 10, 2023

I-957.1 This comment letter is Form Letter H – Alternatives. In response to this comment, please see Topical Response 8 – Alternatives.

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From: TUESDAY MORGAN <themor@sbcglobal.net>
Sent: Friday, March 10, 2023 6:17 AM
To: Dan Fairbanks
Cc: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dr. Grace Martin; Cindy Camargo
Subject: Alternate Plan Proposal/Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As this email proposes alternate land use plans for the West Campus Upper Plateau, I have included the Commission and other potentially interested parties on this email. Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community. For the past year, residents of Riverside, Moreno Valley, Perris, and unincorporated Riverside County have made one thing clear in response to the specific plan: no more warehouses. In every meeting, public engagement, and modification to your site plan you have ignored the community, and it seems you did so intentionally. For 12 months we have asked for alternate plans that did not involve industrial development so close to homes, neighborhoods, and sensitive receptors. It has become clear that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial development of the West Campus Upper Plateau area and I have serious concerns with the lack of alternate plans in the draft EIR. Fortunately, Riverside Neighbors Opposing Warehouses (RNOW) has worked hard to develop three reasonable alternatives to your plan for the Upper Plateau. I am in favor of these alternate projects and believe they hold considerable appeal to the community and are realistic development opportunities for the JPA and the applicant.

1. Alternate plan #1: Leave the property alone and let us enjoy the little bit of natural beauty that still exists in Riverside. We love walking the trails, looking at the animals that live there, and how beautiful it looks in the spring. LEAVE IT ALONE!!

2. Alternate plan #2: The Campus Approach · Concept: University of California Riverside (or a consortium of colleges) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements, and significant open-space with a conservation easement. · Environmental Analysis: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. · Project Objectives: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan). · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

3. Alternate plan #3: The Veterans Village Approach · Concept: A veteran's village that incorporates open space and a developed park (like the Great Park in Irvine) memorializing the local history of the US Air Force, with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices and services, rehab and therapy center, job training and career transition services, and a small business park. · Environmental Analysis: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources. · Project Objectives: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Group associated with March ARB. · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a diverse project that would provide for long-term military service, a multi-use park as well as preserve valuable open space. This plan is a clear sign of patriotic investment and development that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB.

4. Alternate plan #4: The State or County Park Approach · Concept: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA). · Environmental Analysis: These public parks help revitalize communities impacted by the closure of the military bases, providing close-to-home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire. · Project Objectives: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5. · Conclusion: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offering residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses and is a popular alternate plan among members of the public and local communities.

These alternate plans are consistent with the March General Plan and Final Land Use Plan. I encourage the JPA to consider seriously the voices of the public and investigate further these three alternate proposals to develop the West Campus Upper Plateau area. Thank you for allowing me to provide comments on this project.

Sincerely,
Tuesday Ramunni
Orangecrest Homeowner since 2009 and my property backs up to this field.
We love this local walking, riding and jogging area and so do many other families.

Letter I-958

Tuesday Ramunni
March 10, 2023

I-958.1 This comment letter is Form Letter H –Alternatives with the following addition: "Leave the property alone and let us enjoy the little bit of natural beauty that still exists in Riverside. We love walking the trails, looking at the animals that live there, and how beautiful it looks in the spring. LEAVE IT ALONE!!" Chapter 6, Alternatives, of the Draft EIR evaluated the No Project Alternative. In response to the remainder of this comment, please see Topical Response 8 - Alternatives.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Friday, March 10, 2023 11:04 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The justification for this widely opposed project appears to be the creation of 2,600 jobs. How did the applicant identify this number? On what was it based? There is no analysis that I can find to justify this assertion. Please provide any analysis that you may have.

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work. Who in the surrounding neighborhoods would be able to afford their rent with the temporary, part-time, low-paying work that most warehouses provide? On what did you base the assumption that local residents would work in that particular industrial complex? On what did you base your VMT? How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

Please justify your data. Gather information about who works at warehouses, how far they commute, how much they make on an average week, and how that might compare to median home prices in the area. I think you will find that your job and greenhouse gas assumptions are wildly inaccurate.

Moreover, the cumulative impact of approved and planned warehouses already in the region FAR exceeds the number of available employees in this region. The current unemployment rate is at a 50-year low and there are over 4,000 acres of approved and planned warehouses in the 215/60 corridor - at 8.8 jobs/acre, that is over 35,000 jobs. However, in the cities of Riverside, Moreno Valley, Perris, and unincorporated Mead Valley, there are about 630,000 residents (318k Riverside, 212k Moreno Valley, 80k Perris, 20k Mead Valley). There are about 300,000 people in the labor force - (age 16+, labor force participation rate 62%). At a 3.6% unemployment rate (https://www.riversideca.gov/cedd/economic-development/data-reports/data-dashboard), that leaves about 11,000 total unemployed people in the region.

If the average warehouse is generating 8.8 jobs/acre, and there are over 3,000 acres of warehouses approved (World Logistics Center = 2600 acres, Stoneridge Commerce Center = 600 acres, ignore the other 30 warehouses), those two warehouse complexes will generate 25,000+ jobs. The World Logistics Center Draft EIR estimated 34,000+ jobs for that project alone (https://www.moval.org/cdd/pdfs/projects/wlc/wcl-deir0213.pdf, p.4.10-32). It is unlikely that all 11,000 of the unemployed people in the region can or want to work at warehouses, so maybe 50% can work in warehouses. That still leaves a shortage of well over 20,000 jobs and population growth (<1% per year) in our region is not going to add sufficient workers to make up the difference, especially with housing prices being so high and unaffordable for low-wage workers.

It is clear that the immediate region of 630,000 residents doesn't have the workforce to support ANY additional warehouse jobs. The only way to fill these jobs is by importing long-range commuters from outside the region, areas like Hemet and San Jacinto. This demonstrates that the VMT/employee estimates indicating shorter commutes is incorrect. This project will further exacerbate housing stress by requiring workers that commute from well outside of a 15-mile radius of the project.

Even if allowed for your faulty assumption that locals would commute to the site: how would your analysis change if you account for automation in warehouses? Or the fact that Californians are required to purchase electric vehicles by 2035? Given that your own job numbers are based on the year 2045, your analysis for GHG use should account for these in its estimates.

Please justify your current VMT/employee estimates using actual job/population/housing estimates from the last 3 months rather than 7-year-old SCAG projections that are completely incorrect. It is obvious that the region does not have the capacity to staff these warehouses locally.

Thank you for allowing me the opportunity to comment. Please consider more appropriate alternatives such as single-family residential that would actually serve to improve the real-world jobs-housing imbalance; housing is expensive, whereas warehouse jobs are plentiful. Please stop solving the problems of 1996 when they don't apply in 2023.

Sincerely,
Veronica Juarez
8276 Agapanthus Ct,
Riverside, CA 92508
vjuarez0326@gmail.com

Letter I-959

Veronica Juarez
March 10, 2023

I-959.1 This comment letter is Form Letter F – Jobs. As such, in response to this comment, please see Form Letter F Response.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Friday, March 10, 2023 11:16 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the traffic section of the document. First and foremost, the traffic analysis does not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that approximately 20,000 additional trips will take the 215 Freeway. Therefore, CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. How do you justify not considering the main Truck Traffic Routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? I-960.1

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

I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, on Feb. 2 a semi-truck with an overturned shipping container blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the Orangecrest and Mission Grove neighborhoods. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. On my morning commute recently, I saw an 18 wheeler make a left onto Grove Community Dr. and then a right onto Plainview St. straight into a residential neighborhood during school hours. The pedestrians in our neighborhoods are being put in danger by truck drivers that are coming from out of state. Putting more warehouses a few streets down will only increase these infractions. I-960.2

What are the enforcement mechanisms to ensure the supposed mitigation of traffic? Who pays for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For I-960.3

instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused?

Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not right to leave the burden of maintenance and enforcement to City or County public service officers.

Please redo your traffic study to reflect the actual conditions of the surrounding area. Thank you!

I-960.3 Cont.

Sincerely,
Veronica Juarez
8276 Agapanthus Ct.
Riverside Ca. 92508
vjuarez0326@gmail.com

Letter I-960

Veronica Juarez
March 10, 2023

I-960.1 This comment is the same as the first four paragraphs of Form Letter G –Traffic. As such, in response to this comment, please see Form Letter G Response.

I-960.2 This comment raises concerns about existing truck traffic. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Under PDF-TRA-1, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

I-960.3 This comment is the same as the last three paragraphs of Form Letter G –Traffic. As such, in response to this comment, please see Form Letter G Response.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Friday, March 10, 2023 11:19 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

The project applicant conceded that there will be "significant and unavoidable" air quality impacts on surrounding residents. However, I still believe there are numerous deficiencies in the analysis and that it underestimates the air quality impacts.

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR. The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development. Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.
1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)
2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant

percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

I also ask that the March JPA come up with a comprehensive plan for how these mitigations will be implemented and what the consequences will be if they are violated. Who will enforce the mitigations when the March JPA sunsets? How will you assure adjacent residents that our interests will be protected?

Thank you for the opportunity to comment.

Sincerely,
Veronica Juarez
8276 Agapanthus Ct.
Riverside, Ca 92508
vjuarez0326@gmail.com

Letter I-961

Veronica Juarez
March 10, 2023

I-961.1 This comment letter is Form Letter B – Air Quality. As such, in response to this comment, please see Form Letter B Response.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Friday, March 10, 2023 11:22 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

As a member of the community, I am disappointed that none of the alternative plans consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for more than a year. Why did each of the alternative plans include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area, which could include residential, commercial, and recreational uses as long as they are low-density. Please specify what other land uses C-2 zoning allows and why you chose not to pursue these options.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes and that residents have submitted over 2,500 signatures, hundreds of emails, and dozens of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal.

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of your plan?

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered

within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

"The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein.
b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space
d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred.

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning.

Within the last year, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple Developer-hosted community meetings in opposition to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use. Therefore, I urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference and protect existing residential property owners in its planning process.

Thank you for letting me comment on your project.

Sincerely,

Veronica Juarez
8276 Agapanthus Ct,
Riverside, CA 92508
vjuarez0326@gmail.com

Letter I-962

Veronica Juarez
March 10, 2023

I-962.1 This comment letter is Form Letter E – Project Consistency. As such, in response to this comment, please see Form Letter E Response.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Friday, March 10, 2023 11:28 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the study's multiple omissions and lack of comprehensive soil testing in the hazardous waste section. When construction begins, there will be significant disturbances in the soil, and when trucks begin driving into the complex, more than Diesel PM will be admitted. I urge the March JPA to require the applicant to perform comprehensive soil testing to ensure there are no harmful impacts on local residents from previous Military use of the project construction area.

Specifically, I would like to ask:
1. How did you determine which chemicals to test for and which to omit? Why was Diesel PM the only substance considered in the Human Risk Assessment section?
2. Why were known contaminants from other soil studies at the base not tested for in the soil studies for this project?
3. Why were PFAS and perchlorate omitted in soil testing?
4. What was stored in the munitions bunkers? Were there ever any radioactive materials or chemical weapons? How might this impact the health of surrounding areas when the bunkers are demolished? Why weren't tests related to radioactive materials or chemical weapons conducted in your analysis?
5. Why was soil testing only included in a few sections of the project construction area? Given the long time frame since the base was constructed and operated, contaminants are likely to have migrated. A systematic soil test panel should be conducted in a grid pattern for the entire construction area.

Given these deficiencies, I request that you include other hazardous chemicals in your analysis including PFAS, PFOS, perchlorate, trichloroethylene, perchloroethylene, radioactivity (within bunkers), and chemical weapons such as organo-phosphates, Agent Orange (or Agents White, Blue, Purple, Pink, Green), and any other that may have been stored in the weapons bunkers. I also request that you share with the public any information you have as to what was stored in the bunkers.

In addition, there was no discussion of how the PCB-contaminated soil was to be treated, given its concentration of well over a ppm.

The CEQA process requires that the Lead Agency evaluate and disclose environmental risks. Local residents deserve to know the potential risks to their health and this can only be disclosed with a full evaluation of the Weapons Storage Area that comprehensively evaluates and tests for potential contaminants prior to any soil disturbance.

As a Mitigation Measure, I ask that comprehensive soil and weapons bunker testing be performed to evaluate potential contaminants prior to issues and demolition or grading permits of the area. Should any hazardous materials be found in the soil or bunker in quantities that could be harmful during the project demolition phase, we ask that these materials be removed for the well being of the residents in our community.

Thank you for allowing me to provide comments on this project.

Sincerely,

Veronica Juarez
8276 Agapanthus Ct,
Riverside, CA 92508
vjuarez0326@gmail.com

Letter I-963

Veronica Juarez
March 10, 2023

I-963.1 This comment letter is Form Letter D – Hazards. As such, in response to this comment, please see Form Letter D Response.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Friday, March 10, 2023 11:29 AM
To: Dan Fairbanks
Subject: West Campus Upper Plateau, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Draft Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. The draft EIR does not properly analyze the Project's land use, air quality, traffic, health risk assessment, hazards and hazardous materials, biological resources, geology and soils, greenhouse gas emissions, and population and housing sections. It also fails to consider or provide non-industrial alternatives to the Project as consistently requested by the community.

I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

Wildlife:
1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. Are any of the wildlife studies over a year old? My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.

Plant life:
1. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
2. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow?

Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence. The public cannot trust that we are not destroying rare plant life unless a more thorough survey is conducted.

I also request that you determine what will happen when the March JPA sunsets. Who will be tasked with enforcing mitigations for the habitat? How can you ensure the public that these mitigation measures will be enforced?

Thank you for allowing me to provide comments on this project.

Sincerely,
Veronica Juarez
vjuarez0326@gmail.com

Letter I-964

Veronica Juarez
March 10, 2023

I-964.1 This comment letter is Form Letter C – Biological Resources. As such, in response to this comment, please see Form Letter C Response.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Friday, March 10, 2023 11:44 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley.

The zoning designation in the draft EIR on pages 1-15 (35/916) calls for Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities but when looking at the layout and footprint of this developed area, a majority of this construction will be used for warehouses (big and small). Appendix B (which is largely irrelevant as it is not part of this project which makes it misleading to the public) and Table 1-2 on page 1-17 (37/916) summarizes the impacts this project would have including Section 4.1 Aesthetics. I-965.1

The Aesthetics section of the draft EIR holds an arbitrary standard of significance. In what universe does building mega-warehouses on a pristine open area of nature not significantly impact the aesthetics of the area? Even with mitigations, millions of square feet of boxy, concrete buildings will inevitably mar the beauty of scenic views. How does the developer justify their impacts as "less than significant"? Does the March JPA simply take the developer's word for it because this category is arbitrary and left to the developer to define? What about the perceptions of residents who live near the site or who frequent Orange Terrace Park or The Grove? I assure you that they would unanimously reject your impossibly low standard for aesthetics. Will the March JPA demand that the developer propose an alternate plan that truly considers aesthetics from the point of view of the people who live here? Why has the March JPA dismissed the voices of residents who asked for a plan that does not include warehouses or industrial development? The March JPA has already significantly changed the footprint of the Inland Empire. While driving down Alessandro heading into Moreno Valley or the 215 into Perris, all one can see in the horizon are warehouses. It's a shame that is the legacy the March JPA will leave for the people of this area. Building more warehouses is not the answer. I-965.2

Furthermore, the images and justifications in the Aesthetics section of the draft EIR are misleading. Figures 4.1-3 to 4.1-7 show existing and proposed views from five different viewpoints (scenic vistas) surrounding the Upper Plateau. In each proposed view image, the graphic presentation of the warehouses is not consistent with any other warehouse or complex within the March JPA jurisdiction. If none of the surrounding buildings resemble the images presented, on what are they based? I also note that the proposed views are inaccurate based on the size and number of buildings being proposed, which is misleading to the public. Please redo your section so that the images reflect the actual layout of the proposed development with the correct number and size of building units. Please also use images that reflect the actual appearance of warehouses in the area. Otherwise, your images and your Aesthetics section are a fantasy and misleading to the public. I-965.3

The construction of mega-warehouses in what is now a beautiful passive recreation area will also have effects beyond its non-visual impacts on the quality of life in the area. The persistent smell of diesel trucks and the "significant and unavoidable" noise impacts which you have identified will also negatively impact the daily lives of residents. My family I-965.4

and I will be forced to see, hear, and smell the impact every time we open our front door. When the March JPA set out to do this project, I'm sure it was in the name of progress, but when that progress can potentially harm others, it is no longer progress.

I-965.4 Cont.

The March ARB General Plan was written more than 20 years ago and established a goal of repurposing former military land for public benefit and use and creating more jobs for residents of western Riverside County. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. I object to the draft EIR and plan to build more warehouses on the West Campus Upper Plateau because the March JPA and the developer have largely ignored the general plan as it relates to public benefit. This large industrial mega-warehouse development holds no rational or experiential aesthetic beauty or value to residents (a home, a street of homes, a community, or a neighborhood) and visitors (a congregation and recreationists) to this land. It offers minimal low-paying jobs in exchange for destroying a public active and passive recreation area that offers residents and visitors beauty and value aesthetically. It is a shameful plan and the community, which I am a part of, demands better of you.

I-965.5

The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations should be developed, limiting the negative impacts developing this land will have on aesthetics and the residents who will have to live with this development for decades to come. Please don't allow one final grand act of poor land use planning be your lasting legacy. I await your detailed response.

Sincerely,

Veronica Juarez
8276 Agapanthus Ct,
Riverside, CA 92508
vjuarez0326@gmail.com

Letter I-965

Veronica Juarez
March 10, 2023

I-965.1 This comment is the same as the first three paragraphs of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-965.2 This comment asserts that March JPA has changed the footprint of the Inland Empire by constructing warehouses. This comment does not raise any specific issues or concerns on the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

I-965.3 This comment is the same as the fourth paragraph of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

I-965.4 This comment is the same as the fifth paragraph of Form Letter A – Aesthetics with additional comments regarding expected personal experience. This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, in response to this comment, please see Form Letter A Response.

I-965.5 This comment is the same as the last two paragraphs of Form Letter A – Aesthetics. As such, in response to this comment, please see Form Letter A Response.

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From: Yvonne Fernandez <yvonnefernandez3829@yahoo.com>
Sent: Friday, March 10, 2023 9:27 AM
To: Dan Fairbanks
Subject: Warehouse West Campus Upper Plateau

I Yvonne Turner, a resident of this community oppose the building of these warehouses! This will negatively impact our community with noise, pollution, traffic, crime, and destroying our wildlife! To include fire dangers and possible chemical hazards. We are now at this time surrounded by enough warehouses. Enough is enough! The greed must come to a stop 🛑 I want my grandchildren to enjoy what beauty is left of our community. Please stop the building of these warehouses!
Sent from my iPhone

I-966.1

Letter I-966

Yvonne Turner
March 19, 2023

I-966.1 This comment raises general concerns about the Project's impacts but does not raise any issues or concerns on the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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9.6 Public Meeting Responses to Comments

Comment	Name	Date
Public Meetings		
PM-1	Kristine Doty	01/11/2023
PM-2	Gabriella Mendez	01/11/2023
PM-3	Abdallah Karim	01/11/2023
PM-4	Susan Nipper	01/11/2023
PM-5	Jerry Shearer	01/11/2023
PM-6	Jennifer Larrett-Smith	01/11/2023
PM-7	Eric Carlson	01/11/2023
PM-8	John Lyell	01/11/2023
PM-9	Sophia Guzman	01/11/2023
PM-10	Christopher Neilson	01/11/2023
PM-11	Aaron Bushong	01/11/2023
PM-12	Gregory Garnier	01/11/2023
PM-13	Amy Dahdul	01/11/2023
PM-14	Michelle Rodriguez	01/11/2023
PM-15	Christine Martin	01/11/2023
PM-16	Lewis Lopez	01/11/2023
PM-17	Anthony Noriega	01/11/2023
PM-18	Alice Musumba	01/11/2023
PM-19	Anthony Scimia	01/11/2023
PM-20	Kevin Heinmann	01/11/2023
PM-21	Pete Elliott	01/11/2023
PM-22	Honey Bernas	01/11/2023
PM-23	Mike McCarthy	01/11/2023
PM-24	Connie Ransom	01/11/2023
PM-25	Andrew Silva	01/11/2023
PM-26	Christine Heinmann	01/11/2023
PM-27	Cameron Barrius	01/11/2023
PM-28	Donna Lloyd	01/11/2023
PM-29	Unknown	01/11/2023
PM-30	Mia Smith	01/11/2023
PM-31	Joaquin Castilgos	01/11/2023
PM-32	Andrew Larratt-Smith	01/11/2023
PM-33	Lewis Allen	01/11/2023
PM-34	Tim Martin	01/11/2023
PM-35	Melissa May	01/11/2023
PM-36	Bryton Mays	01/11/2023
PM-37	Melody Clark	01/11/2023
PM-38	George Hague	01/11/2023
PM-39	Nicole Bernas	01/11/2023

Comment	Name	Date
Public Meetings		
PM-40	Chair Conder	01/11/2023
PM-41	Andrew Silva	02/08/2023
PM-42	Mike McCarthy	02/08/2023
PM-43	Adam Collier	02/08/2023

March Joint Powers Commission

Verbatim Minutes from January 11, 2023

Agenda Item 8: Public Comments

Kristine Doty

PM-1

Good evening, my name is Kristine Doty and I have lived in the Orangecrest neighborhood since 1990, 33 years. I am a member of the Riverside Neighbors Opposing Warehouses. I oppose the Meridian West Campus Upper Plateau project for several reasons. First and foremost these warehouses are smack-dab in the middle of our neighborhood, surrounding these industrial buildings on three sides are homes. Homes with families, babies, senior citizens and young adults. Homes where holidays are celebrated, memories are made and children grow up. Homes that will also have contaminated air, traffic noise and humongous warehouses in full view from their back yards. Please ask yourself, would you want to live in a community surrounded by warehouses on all three sides as the houses the North of the plan will be. Would you want to live in a community where trucks spew thousands of pounds of pollutants into the air next to your home and your children's schools. I suspect the answer would be no, you would not. Well, neither do we. Additionally, I oppose this project because our community, the very people that will be breathing the polluted air, hearing the trucks thundering down the road and seeing the giant industrial buildings have not been consulted about any part of the projects design. Despite ten months of pleas about the warehouses, not one design change has been altered in regards to the size or the setbacks of this monstrous project. This is not engaging meaningfully with the community you serve, this is not listening to what we want for our neighborhoods, the March Joint Powers Authority committee has an obligation to listen to us, your constituents who voted you into the public office you now hold. I ask that the March JPA require the developer to submit a plan for alternative land use ideas that do not involve warehouses. As our groups name suggests, it is the warehouses we oppose. I ask that you create a community advisory group. This would be a unique opportunity to meaningfully engage with our community. Benefits from such a collaboration would include create, new ideas for land use and a solution that would satisfy all stakeholders. Such a group would also demonstrate the JPA is truly interested in engaging with the tax payers who's land you are charged with repurposing. I truly hope you will take our concerns to heart and create a community advisory group with alternate land use ideas that do not include warehouses. Thank you.

PM-1.1

1:44:51

1. Gabriella Mendez

PM-2

Hi, I'm Gabby, Gabriella Mendez, I'm also with RNOW, I am opposed to the industrial build to warehouses, specifically the Meridian West Campus Upper Plateau. I ask that you push the developer to consider an alternative plan as the community has been asking for that for many, many, many months now. A couple of things, a warehouse job is respectable, hard labor and my parents were warehouse workers. I completely understand the wages that the workers are paid will not be enough for residents in Orangecrest to pay their mortgages so the job payment is not enough for this community to pay their mortgages. This community is already vulnerable as they are already under the flight path for the March JPA so they are already having airplanes flying over their homes

PM-2.1

PM-2.2

PM-2.3

PM-2 Cont.

constantly and airplanes are a very dangerous pollutant. Adding more trucks to the community or adding more warehouses is not going to help the residents health at all. There is nothing that this community could benefit from this warehouse in their community and all we ask is that you build an alternative plan and leave the area alone. This is one of the few grey spaces that are left in the City of Riverside that is of this size and we ask that you conserve it. We have bikers that travel to that area, there's a middle school biking group, it's a big recreational area for these residents and is very loved by the community. It is not a logical decision to build it right in the heart of the community. Please listen to your residents as they've been opposing this for several months and I have not heard of a single person supporting it in the various meetings I've been to. I am also here with Arnell opposing this project. Thank you.

PM-2.3

PM-2.4

1:41:23

2. Abdallah Karim

PM-3

Good evening, my name is Abdallah Karim and I live in the Orangecrest community, center area, I'm here with RNOW to oppose and propose an alternate plan to that doesn't include warehouses for that area. In my opinion for the last ten months, there are three types of members on this board. There's first type of person that actually cares about hearing us out. The second is the one who pretends to care and the third who blatantly doesn't care and is shown by their actions. You sit there and pretend to pledge allegiance to the flag, you can pray, you can do whatever you want but for the second and third type of person is hypocritical and you pretend to hear us out for ten months with no result. Our requests have not been answered and you continue to press on with the developer putting up no trespassing signs and continue to do what's good for the JPA and the JPA alone. I request as many people will request to create a community advisory group so that we can actually have dialog between the JPA developer and can have meaningful input from what is built. Between the traffic, the air pollution, the schools, the fact that it's in the Inland Empire when we don't need anymore warehouses in the Inland Empire is one of the many reasons the project is not supported by this community. I hope if you're the first type of person that somehow the second and third type of people today you can go ahead and help influence them to actually listen to us and work with us. Thank you.

PM-3.1

PM-3.2

1:38:56

3. Susan Nipper

PM-4

Hello, my name is Susan Nipper and I'm an introvert so standing up here today is not easy for me but this topic is so important. I'm a member of Riverside Neighborhoods Opposing Warehouses and I'm opposed to the plan to build industrial warehouses essentially in our back yards on that West Campus Upper Plateau. As a homeowner in Orangecrest, a retired elementary school teacher, a long time attendee of the Grove Community Church, I'm passionate about this. These warehouses are planned in very close proximity to the Grove Community Church where we have a robust preschool program and where thousands of children play soccer, football, baseball, close to year-round on our fields. The increase from air pollution from truck traffic will be dangerous for our children and grandchildren escalating childhood asthma and other health concerns as a consequence of your actions. Please do what is right for the families that are living in Orangecrest and surrounding communities and consider an alternate plan other than warehouses. Thank you.

PM-4.1

PM-4.2

PM-4.3

1:36:32

4. Jerry Shearer

PM-5

Hi, my name is Jerry Shearer, I live in Orangecrest, I'm a member of Riverside Neighbors Opposing Warehouses and I am here to comment on the draft EIR for the Meridian West Campus Upper

PM-5.1

Plateau project. I am opposed to the plan to build industrial warehouses in the West Campus Upper Plateau and am especially disappointed. The commission did not hold the JPA employees and the builder accountable for not genuinely engaging with the public during the pro-longed preparation of this plan. For ten months I have spoken to and consistently emailed you asking that you compel the JPA and the builder to consider the health and welfare, quality of life and dreams, the economic reason for creating the land use plan that benefits the communities directly impacted by the development of this land. By shameless proponent of leave it as it is thinking, the reasons to do so are deeply painful for all who live in this part of Riverside county. Our community understands that development of this land may be inevitable due to the greed of developers of the Lewis Group. This is inconceivable to the public, why the Lewis Group and the JPA haven't offered an alternative plan for developing this land. One that addresses the clear and present messaging from the community. No more warehouses. Instead, we have floor plans that include up to 4,986, 650 square feet of industrial warehouse space within 300 to 800 feet of Riverside residents. How are any of these plans expressing the explicit and persistent concerns of the community. No more warehouses. Build baseball, soccer and football fields, build interactive nature trails, build solar and wind farms, build auto repair shops, commercial shops or restaurants, build single family homes, build a true mixed use complex that will allow residents to enjoy the land and the developer to build and profit from the project. Build something that gives back to the environment as much as it extracts from it. None of this will happen unless you, the commission demands it. And since we are here tonight at this point of the process it seems like you are not holding the JPA accountable. Representatives from Riverside will you stand up for your residents. Perris and Moreno Valley, how will you protect the people you were elected to serve. Our county supervisors how will you mitigate the unrestrained logistic sprawl overrunning the western part of our jurisdiction. If it isn't too late, please take action tonight to convene a community advisory group. I'd volunteer for it and involve them in these vital land use decisions. I also ask that you compel the JPA and the builder to reconsider their faulty draft EIR and send them back to develop alternate plans that do not include warehouses and address the real concerns of the community who will have to live with this development on a daily basis. Thank you again for your time. Mr. Fairbanks there were trucks in my neighborhood for more than 20 minutes again today.

PM-5 Cont.

PM-5.1 Cont.

PM-5.2

PM-5.3

PM-5.4

1:33:28

5. Jennifer Larrett-Smith

Good evening, my name is Jen Larrett-Smith and I am a member of Riverside Neighbors Opposing Warehouses. I had a really difficult time thinking of what I was going to say to you tonight, you've seen me speak before and I've make arguments, quoted statistics, tried to make the case for how warehouses are hurting our communities and don't even make sense economically anymore but the facts have fallen flat. Every alternate plan other than the no development in the draft EIR West Campus Upper Plateau warehouses. You say that we can't build residential on the land even ALUC zones it C2, the same as my house. We've asked you to look into solar panels, we've asked you to reconsider your original plan for business parks with high tech jobs there are many alternate land uses. Literally the only thing we are asking and what unites us is in the very name of our organization, we oppose warehouses but the draft EIR didn't reflect that and I'm tired. I've been organizing my community around this for almost a year, I've gathered thousands of signatures, spoke at meetings, met with people individually and I just don't know what is going to get through to you. So instead of quoting facts today let me just tell you about a neighbor of mine. I have a neighbor who used to come to these meetings early this year but he's not here tonight. He can't come because he cares for wife who is sick with cancer. She has no family history of cancer and my neighbor has asked me, why has this happened to her. Could it be because of where we live. I honestly don't know what to

PM-6

PM-6.1

PM-6.2

PM-6 Cont.

tell him. We have the worst air quality of any region in the county and according to the California Air Resources Board, diesel engine omissions are believed to be responsible for about 70% California's estimated known cancer risk attributable to toxic air contaminants. This specific plan wants to bring in three thousand more diesel truck trips every single day. It says that the air impact or quality will be significant and unavoidable. I have two kids, one is 13 and one is 11 so I can't afford to be tired, I have to keep on fighting. I have to fight for my life, for my children and for my neighbors. Please consider the human impact your decisions have. You're a public agency tasked with repurposing excess federal land. You have the authority to make decisions. You're not a rubber stamp for a developer. You have to do better. Please hear our requests tonight and push the developer to come up with an alternate plan that doesn't include warehouses and create a community advisory group so we have a real say of the land use decisions that will be impacting us and our families for decades. Thank you.

PM-6.2 Cont.

PM-6.2

1:30:10

6. Eric Carlson

PM-7

My name is Eric Carlson and I've been an Orangecrest resident since 1998. My wife and I have raised our two sons in this community and are deeply entrenched here. As well I've been a biking coach for Woodcrest Christian Middle School and High School since 2016. I have been the head coach of this program for the last two years. We have about thirty members on our team between student athletes and an all-volunteer coaching staff. Our program has benefited tremendously by enjoying the trails situated behind the land under the control of the March JPA. One year ago our team organized a trail clean up and I had the pleasure of meeting with Dan Fairbanks and he came out to help us with our efforts. That day we removed over two thousand pounds of trash. Largely the result of illegal dumping. Our school team values this land, the hiking and biking trails found here are different than the trails across Alessandro Blvd. in Sycamore Canyon as these trails are more gradual and involve less technical skills for biking. In the time our team has been using these trails I've seen several other school teams enjoying them as well. Schools from Corona, Beaumont, Temecula, Murrieta and elsewhere. I've met people that have travelled as far as Los Angeles and San Diego to enjoy these trails. Additionally there is a large community of seniors in their 60's, 70's and beyond that ride their bikes and hike on these trails. There is plenty of other available land along the 215 corridor that can and is being developed into warehouses. On this land I've observed owls, falcons, hawks, raccoons, rats, rabbits, a pack of coyote, different variety of snakes. There is an important eco system that will be jeopardized if this land is developed. The maintenance cost of leaving this land undeveloped could be minimal if the land was placed in public trust. I ask you to model what the City of Corona has done with the Skyline Trail. It's closed off to vehicles, let the people enjoy it and leave it as is. Thank you.

PM-7.1

PM-7.2

PM-7.3

1:27:38

7. John Lyell

PM-8

Hello, my name is John Lyell and I'm a lifetime Riverside resident and was born on the military base and am a member of the Riverside Neighbors Opposing Warehouses and am opposed to the plan to develop warehouses. I think we needed to think outside the box, consider following the model that Irvine used with the Great Park, the similar repurpose of federal lands and have a visionary and innovative plan for use of this space. They have a botanical gardens, hiking trails, water parks, sports fields, museums, aquatic centers, food and beverage facilities, they're building an amphitheater with a partnership with Live Nation which Riverside has a good relationship with and this is a great location close to the desert, San Bernardino, Redlands, Corona, Temecula, sports complexes, some youth tournaments, you know they pull in 200, to 300 thousand dollars per weekend for major

PM-8.1

PM-8 Cont.

tournaments, pretty crazy. I think we should be considering large buildings as technical hubs, we should be contacting Google bringing in technical, high paying jobs, not warehouse jobs and with the cost of living here it could be very beneficial for some of those companies. I think that the advisory group that others have discussed is a great idea. I've worked with some of you up there for longer than probably most people and I find you to be honest and honorable and I've never found you to go a different direction than your constituents so I hope in this case it will go the same way. I have major concerns with Riverside stress on infrastructure, streets, water electrical and I know Riverside struggles with making the repairs and maintenance on those items. Thank you very much.

PM-8.1 Cont.

PM-8.2

PM-8.3

1:24:42

8. Sophia Guzman

PM-9

Hello my name is Sophia Guzman and I'm back again to voice my opinion on behalf of the community of Riverside. According to UC Berkley, California active transportation safety information page Riverside is in the top 10 for a number of cyclists crashes with a total of 1,608. In the top 5 county for a number of 43 cyclists killed in California within 2017 and 2021. Some of you may have heard of Robert Stockton. He was a dedicated mountain biking coach for my school but was sadly a victim of a driver hitting him. He was a great role model for my team but someone I will not be able to meet because of lack of road cycling and pedestrian laws. I am not only researching from a perspective as a 13 year old athlete or just someone in the Riverside community but I am looking at this new project with a business perspective. 4 in 5 economists expect a long and painful recession in 2023 and 2024 which can bring rising levels of unemployment and failing retail sales. Many others and I believe that you are not listening to the voices of the locals. In addition to beautifying Riverside and supporting local Riverside artists I believe we should help beautify our earth. I would like to end this with a bible verse that my team and I always go back to reflect on. Romans 5, 3 to 4. Not only that but we rejoice in our suffering knowing that suffering produces endurance and endurance produces character and character produces hope. Thank you for your time.

PM-9.1

1:22:45

9. Christopher Neilson

PM-10

Hello guys, my name is Christopher Neilson, first I just want to say great job to the young lady before me, that was quite impressive. I'm a member of Riverside Neighbors Opposing Warehouses. I'm opposed to the plan to build industrial warehouses on the West Campus Upper Plateau. I ask all of you that you push the developer to consider an alternative plan that does not include warehouses for that area. I know you've heard a few comments tonight and they all have great points. I want you to realize that we are united in opposing warehouses whether it's leaving it for mountain bike paths, that's a brilliant plan or using it for mixed use is a brilliant plan. Quick personal story, took me ten years to save up to move from Box Springs to Orangecrest and I love it here. I still have a rental in Box Springs. I rent it by the room mostly to single parents. I feel bad for how unaffordable housing is. Two of the single parents there are Amazon employees, they can barely afford even a room for rent. The argument that you're bringing jobs to Woodcrest and Orangecrest, these are not jobs that we're asking for or even need. If you know the cost of living now in Orangecrest is insane so you're going to be having people from out of town creating more traffic and traffic on top of trucks, that's traffic on top of security, that's employee traffic. This is from the Chicago Tribune 2015, long term exposure to noise pollution from traffic may reduce life expectancy the news study contends living near busy roads may increase the risk of stroke to older individuals. I live by Barton/Van Buren and love the area, love Gless Ranch, cool market. It is the best that my family can afford. It is obviously a very large complex going in at Barton and Van Buren. I've camped in my back yard and heard the bulldozers with my daughter and

PM-10.1

PM-10.2

PM-10.3

PM-10 Cont.

looking at the stars and I find it quite sad that it's the same thing that all of these houses are going to have to endure. I have personally biked these paths and they are amazing. I've ran into coaches from San Dimas. It is a beautiful land and I believe it's something in my opinion that should not be filled with warehouse noise, traffic, pollution that we don't need, jobs that we're not asking for. If you go down Van Buren there are so many places that are hiring right now. Keep our jobs local, don't fill them with warehouse employees at the cost of pollution and noise traffic. Thank you.

PM-10.3 Cont.

1:19:18

10. Aaron Bushong

PM-11

March JPA Commissioners, my name is Aaron Bushong and I am speaking tonight as a Member of Riverside Neighbors Opposing Warehouses. I have lived in the same house in the Orangecrest neighborhood for almost 23 years. During that time I have joined my neighbors in attempting to work with the March JPA on responsible planning for the 4,400 acres of surplus property. My neighbors and I have worked to oppose the DHL facility and were ignored. And DHL failed within 4 years. My neighbors and I have worked over the past 15 years to oppose the development along the Meridian Parkway and Van Buren Blvd. We have been ignored. And one merely needs to drive those roads to see that one of the most desirable and attractive roads in the city of Riverside has been transformed into a sea of unsightly office buildings and warehouses that is inconsistent with responsible city planning. Now, my neighbors and I are working to oppose the West Campus Upper Plateau project and we are being ignored. Over the past 23 years the March JPA has never meaningfully engaged with the community, has never formed a community advisory board to guide their development decisions and has never pursued a project that respects the safety, wellbeing, and quality of life of residents. Instead, the March JPA has ignored the concerns of the community and hidden from scrutiny withholding information from the community and scheduling meetings in the middle of the day when most community members are unable to attend. Ignoring the concerns and oppositions of the community has resulted in among other disasters an airplane crashing into a warehouse, a warehouse fire and a jack-knifed big rig on a residential street that stopped traffic for 45 minutes. Each of which put residents in danger. All three of which were the result of the lack of foresight and utter disregard for residents' safety and wellbeing demonstrated by the March JPA. The proposed West Campus Upper Plateau project will only increase the possibility of similar disasters and place them even closer to residential homes. Opposing the West Campus Upper Plateau project should not be a difficult decision all you have to do is ask yourself would you want warehouses in your backyard. In your parents backyard or in your children's backyard. Your answer should be obvious. On behalf of the Riverside Neighbors Opposing Warehouses I implore you to consider alternative planning for the West Campus Upper Plateau that does not include warehouses and to immediately create a community advisory board to guide you and the responsible planning for the West Campus Upper Plateau that will preserve the health, safety and wellbeing of the surrounding neighborhoods.

PM-11.1

PM-11.2

1:15:38

11. Gregory Garnier

PM-12

My name is Greg Garnier, I've lived in Orangecrest for over 30 years in two different homes, one of them on Barton Street that will be significantly impacted by the connecting of Barton from Alessandro to Golf Community??? I do not support any further warehouses. I am a member of RNOW and I have walked most of this part of Riverside. It would be safe to say that maybe one percent of the residents support that. I got by my log that I took months ago. I think that the additional traffic trucks being brought into the area is just going to be a disaster. The air quality is already pretty poor. The 215 which is where the draft EIR report shows can barely manage the traffic

PM-12.1

PM-12 Cont.

we have now. This is not going to get better over time. I respectfully request some kind of plan B or a plan C, scaling back this thing. An open area would be kind of nice to have. Expand the parks, but definitely scaling back would be a minimum thing to do. Your constituents don't like this. I really don't see there's any alternative. A community direct feedback advisory committee is a reasonable thing to do with a couple of RNOW members on it. Thank you very much. PM-12.2

1:13:20

12. Amy Dahdul

Good evening everybody, my name is Amy Dahdul and I am a member of Riverside Neighbors Opposing Warehouses, opposed to the plans to build industrial warehouses on the West Campus Upper Plateau and I am pushing the developer to consider an alternative plan as well as putting together a neighborhood advisory committee. I've been coming to these city council meetings, driving to Moreno Valley, going downtown after work and trying to get more and more people on board with our point of view and what I mean by people on board I mean you guys. I live in Orangecrest, I understand the economic factors behind this project but there is an alternative to warehouses. There definitely is and we feel like you guys are just not listening to us. I understand PM-13.1

PM-13

the business of tilt ups. I have loved ones and friends who work in construction. They did all these tilt-ups around here. I'm a mountain biker, Jensen USA has a warehouse over there. We're not saying you guys never should have done this or warehouses never belonged here but enough is enough and you look at apartments and the jobs you're bring here, I'm not sure how many warehouse employees can afford a $2,300 rent on a one bedroom apartment and I know because that's how much the apartments are right near 215/60 freeway. I looked at it for a friend of mine. $2,300 for a one bedroom apartment. I'm not sure with my salary if I could afford that. What PM-13.2

I'm asking you guys is to consider the option of doing something really great for Riverside and what we can do is consider the people that come here for recreation activities. I know a lot of teams from San Diego that come up here for mountain biking, it's not just a mountain biking thing, however, I'm just asking you guys to consider an alternative. Warehouses is enough. I know that the builders are looking at something that will make the most profit and I understand that and right now I keep hearing that warehouses are the only way to make money. I just can't imagine that you guys would look at that as being more important than the lives of your constituents and the lives of the children in your neighborhood. Like I said, I appreciate the economic factors behind this project but I'm not sure that bringing in more jobs that don't pay enough to even live here is really helping Riverside. Thank you and please consider an alternative, get us on board so that we can help you with something that would be really great for Riverside. We have the energy, we have the patience, we have the drive, we are showing up after work exhausted and tired, please. PM-13.3

1:10:11

13. Michelle Rodriguez

First of all I wanted to thank everyone for showing up today. Land use is a critical issue that impacts our communities for generations to come. My name is Michelle and I live in Mead Valley and I am a member of Riverside Neighbors Opposing Warehouses. Like most people I do not pay much attention to carcinogens in our environment but I quickly got reality check when my 8 year old daughter was diagnosed with an aggressive case of cancer. A natural response to this is asking why, why did this happen, why this disease and why her. Two things need to happen for a young person to develop cancer. First a genetic disposition and then mutations caused by environmental factors. My daughter Ecstasy courageously fought the disease until she took her last breath at 10. I now have my surviving daughter Evangelin who's 8 years old, the same age her sister was when she got diagnosed. I'm out here today because I'm concerned for Evangelin's health. She has the same PM-14.1

PM-14

PM-14 Cont.

DNA as her sister and I cannot change that but I can do my best to protect her from environmental harms. I do not want her to meet the same fate as her older sister. I want her to live a long and healthy life. According to the International Agency for Research on Cancer, diesel engine exhaust is carcinogenic to humans, meaning that it is found sufficient evidence to conclude that diesel engines exhaust increases ones chance of getting cancer. Building more warehouses will increase the presence of diesel trucks in our communities. We've already seen it. I have lived in Perris since 2003. The American Lung Association's annual reports that the Inland Empire rates worst in particle and ozone pollution in the United States year after year. It is not normal to get alerts on our phones to warn us to avoid going outside. The ALA states that this pollution causes inflammation, shortness of breath and damage to the airways that leads to asthma, cancer and premature death. Living within a half mile of a warehouse increases your chances of having a heart attack. The goliath logistics industry does not have our best interests in mind. This is why I ask the Joint Powers Authority to hear us out and reconsider land use. I ask JPA to urge the developer to consider a substitute plan that does not involve more warehouses and to build a community advisory group so that we can have a voice in the development that will directly impact our families today and for generations to come. Thank you for your time.

PM-14.1 Cont.
PM-14.2
PM-14.3

1:07:30

14. Christine Martin

PM-15

Wow, good evening members of the March Joint Powers commission, my name is Christine Martin and I want to thank you for creating a space to hear from concerned members of the community. I am here tonight as a member of RNOW. I'm opposing the plan to build industrial warehouses on the West Campus Upper Plateau. This 800 acres of open space is surrounded by homes, Riverside's Orangecrest neighborhood. Riverside is built on neighborhoods and it's important that we take care of them. Building warehouses in the midst of the Orangecrest neighborhood will create more pollution, more noise pollution, more traffic and more stress for that community and it will negatively impact all of Riverside's population. To remain a desirable city and grow as a community, it is vitally important that we maintain our neighborhoods as healthy, happy places for people to live. Not degrading neighborhoods by building warehouses in the middle of them. I'm here tonight to ask you as other people have to urge the developer to consider an alternative plan that does not include warehouses for that area. Secondly, I ask you to create a community advisory committee so that the people who are directly impacted by land use have a chance to make a meaningful input to what is built. In your role as leaders, it is critically important that you listen to the Orangecrest community before making decisions that are so impactful to this neighborhood and Riverside as a whole. As a resident of Riverside for nearly six decades, I am very grateful that this has been a lovely place to live, work and thrive. Please don't transform Orangecrest from a neighborhood where kids and families thrive into a land of inhospitable warehouses. Thank you.

PM-15.1
PM-15.2
PM-15.3

1:04:28

15. Lewis Lopez

PM-16

Hello and thank you for allowing me a few minutes to speak on something that I feel very passionate about. My name is Lewis and I'm one of the many parent coaches for the mountain bike team at Woodcrest Christian High School and middle school. I understand your plans to develop the land South of Alessandro and east of Barton Road are based on an opportunity to generate revenue. The idea presented to us as members of the community is that it will attract jobs and will be good for us economically. I whole heartedly believe that this development is going to have a very negative impact on the younger generation of student riders by taking away from them a very accessible part of the trail system. Not all fields are created equal, not all trails or open space is created equal. Some

PM-16.1

PM-16 Cont.

fields and trails are rockier and steeper than others. I know it's difficult to see the elevation features on Google Maps but this area is extremely unique. It's the perfect training ground for new mountain bikers, the elevation changes you see from Alessandro/Van Buren and from Barton to Meridian are very mild. It's perfect for introducing new mountain bike riders to mountain biking. All of our mountain bike team middle school riders learn to ride on the very same trails that you plan to take away on this development. I am appealing to the humanity in you and I'm asking that you reconsider the location of this development. If anyone listening to us speak today has any influence on voting to move this project somewhere else, I urge you to have an open heart and leverage some of that power you have in your vote to help keep these trails accessible to our students. Not everything in life should be transactional and material in nature. You have an opportunity to support this community of student mountain bikers by keeping these trails in their natural condition. This is not limited to Riverside student athletes. We regularly see students from neighboring communities enjoying these trails. I only have one question, if you've ever had the privilege of visiting any of our nations beautiful national parks, when you were there were you thankful that our politicians before our time had the wisdom and the forethought to protect such pristine land and to protect it from development. If you share the same gratitude and if you admire the wisdom of the politicians that established the protection of our national parks, I would like to remind you that you have the power and opportunity to do the same here at a local level. To you, I'm sure this plot of land is no national park but I promise you that to those of us who use these trails, it is our natural wonder. If you have the ability to sway votes or influence key members to protect this area and to keep it accessible to our students in our community I implore you to take that influence you have to do everything in your power to keep this plot of land in its natural state. Thank you for your time.

PM-16.1 Cont.

1:01:34

16. Anthony Noriega

I want to publicly thank Jennifer Smith for having the courage to stand up and lead the community of Orangecrest and Mission Grove. She had the damn courage to stand up and to lead over 600 community members. I want to thank the people that attended the meeting tonight. and the people that are speaking out. This is our opportunity to be engaged in what happens in our back yard. Good evening, my name is Anthony Noriega, I am the director of District 5 of the League of United American Citizens for the Inland Empire. I am a veteran, I'm a 21 year resident of Orangecrest community and I also retired in 2015 after serving for 26 years as a civilian employee for the United States Air Force. My last retirement was as the personnel advisor to the 4th Air Force Commander located on March Air Reserve Base. I am here tonight to support RNOW in their opposition to the Meridian West Campus Upper Plateau project. The two year old data in the EIR report reflects that some of the pollutant levels exceeds allowable levels that will result in impacts on the air quality in the project site. The homes, the schools, the businesses located in the immediate project site and impact the Orangecrest and Mission Grove communities. We do not believe that the proposed mitigating factors in the EIR are sufficient to override the increased negative air quality impacting the over thirty thousand residents of Orangecrest/Mission Grove and the ten thousand K-12 school children attending the community schools. RNOW is extremely disappointed that the JPA board as a whole has not engaged with them and the community in good faith. They have been expressing to you for over 11 months that they do not want this warehouse on this project site. As we enter the EIR review period, we ask that you do not dismiss the past and present concerns by RNOW and the community. We ask that you give serious consideration to the community opposition input to the EIR. We ask that you work with RNOW and to the community to address and resolve these issues concerning the project. We urge you to vote no on the project or pause the project to allow the

PM-17

PM-17.1

PM-17.2

PM-17.3

PM-17 Cont.

community to build the vision along with you on the future we want to see. That future should consider alternate land use and more warehouses. Thank you.

PM-17.1 Cont.

57:26

17. Alice Musumba

PM-18

Good evening, my name is Alice Musumba and I stand before you as an Orangecrest resident, as a parent, as a public health professional and a cancer survivor who's diagnosis about 15 years ago was attributed to environmental exposure. I have been a resident of Orangecrest for just one year and I stand with RNOW to oppose the warehouses that are being build. It may not strike you as real but I'm going to tell you a story. The doctor told me my cancer was attributed to environmental exposure. My appeal to you guys with all due respect is to consider environmental justice for the lives of me and the others who have shared their stories of the impacted by the environment we live in. What we are creating in our neighborhood will out live us. I'm here for who knows, 10 years, 20 years, 30 years, who knows, God willing. What do I do for my kids, what will you guys do for your children, for the people that voted for you to take care our neighborhood. As a public health professional, I attest to all the statistics that have been given to you. Should be continue polluting our neighborhood for a mere dollar or two that will be here for a day, then what. What happens to our neighborhoods. I appeal to your human nature, to your leadership, you've been placed in power to do something so please involve us. I'll bring my expertise as a public health girl. I'll bring my expertise as a cancer survivor. I will work with you. I'm a parent and my kids are wanting to do things, I say you can do whatever you want but don't play in the yard because there are people working out there. You guys have the power to tell the developers whatever you do get all the money you can but don't build warehouses. Can you do that? Will you make sure that our environment stays undisturbed? That's my prayer for you. That's my appeal for you. Thank you.

PM-18.1

54:30

18. Anthony Scimia

PM-19

Good evening, my name is Anthony Scimia, I've been a resident of Orangecrest for the past 13 years and I just want let the members to know that what we're experiencing as a family with the recent addition of all the warehouses, I'm constantly woken up at night starting at about 11:00 pm I start hearing the back-up devices of the trucks, the constant devices going off. I'll wake up two or three times throughout the evening. This is just with the current warehouse situation so I'm tremendously concerned when we're going to add all these additional warehouses just seconds from my home and all of our homes in Orangecrest what that's going to create in the evening time with all of their devices going off, the trucks, the pollution. It's a very big concern for all of us so please take that into consideration. We moved to Orangecrest to live the lifestyle in Riverside that our family deserves so please preserve that for us. Yes we are opposed to the Meridian West Campus Upper Plateau and hopefully you can take that into consideration. Thank you.

PM-19.1

52:46

19. Kevin Heinmann

PM-20

Good evening, my name is Kevin Heinmann, my family and I have lived in Riverside in the Orangecrest area for over 20 years. I am also a member of RNOW and I am opposing the warehouses being developed in the Upper Plateau area. I'm asking the Joint Powers to come up with another plan. There's got to be something else that can go there. That area is surrounded on three sides by homes. Warehouses will bring truck traffic, pollution, noise, straight into our back yards. I'm going to say that again, have you looked at the map, three sides of that are houses and you're talking about

PM-20.1

PM-20.2

PM-20 Cont.

putting warehouses in there. It just doesn't make any logical sense to me. I'm just asking that you do what's right for our neighborhood and don't put warehouses on that land. Thank you.

PM-20.2 Cont.

51:44

20. Pete Elliott

Commissioners, good evening. Thank you for taking the time to listen to us. My name is Pete Elliott and I've been a resident of Orangecrest for about 20 years now. I'm also a public servant and I've served this community for over 25 years. I've learned a lot about my community. So much so that I moved to it, I wanted to be a part of it. But I'll tell you what, these stories and my neighbors that I have met over the last year are so compelling and so pushing on my heart strings, on my morality that it causes me to want to fight, it causes me to want to fight for my neighbors and my kids because no one else is going to do that for me except my neighbors now that I know are here with us today. We're very passionate about this, we know what this will do to our community because I had an activist tell me that you guys sound like a bunch of not in my backyard type of folks. I said stand by, we are no more in our backyard. We have this, we have millions, millions of square feet of warehouses in our backyard. We live it. We have folks here that are suffering with cancer and it infuriates me that they have to be subjected to something like this. It infuriates me that we have no seat at the table, none. Zero. It infuriates me that the developer throws money around like it's free. But I will tell you, we will fight til our last breath. We want a seat at the table. That's what we're asking for. We want people to start listening us. We're very reasonable, we are. We just need a seat at the table. I hate to think that this meeting was scheduled in this building, seven miles away from the people that are affected most so I would like to make a formal ask that before this EIR closes, that we have a nigh time community meeting in the Orangecrest/Mission Grove area so that people who are right now doing homework with their kids and cannot make it here during rush hour have a chance to show up in person and talk to you. God Bless you, do the right thing. Thank you.

PM-21

PM-21.1

48:33

21. Honey Bernas

My name is Honey Bernas and I have been a resident of Riverside county for over 55 years and an Orangecrest resident for 18 years. I grew up in Mira Loma where we were surrounded by warehouses and truck traffic. Almost everyone in my family, nieces, nephews, we all suffer from asthma. We used to go on lock downs and couldn't go out at recess. Our lungs were killing us. We couldn't go outside and play. I know how busy you are but there is a time and place for everything but I don't know what this county is doing with all of these warehouses but I think you would all agree that in the middle of a neighborhood where there are schools, churches, sports fields, that just makes no sense. It is the worse decision and you are the only ones that can make a difference here. We can talk, beg and plead but I would hope that you would put the health and wellbeing of your constituents ahead of the almighty dollar. Especially in our neighborhood. Thank you.

PM-22

PM-22.1

46:33

22. Mike McCarthy

Good evening Commissioners, it's your e-pal and best friend Mike McCarthy here with RNOW. I'm going to hit you at ???????jaw stay? We want to go with the strength of this EIR. As a public agency in trust with redeveloping public land. I encourage you to go with economic patriotism, support local businesses, local entrepreneurship and local decision making. This vision aligns with the March JPA's final reuse plan that supports the creation of a quote community preference land use plan consistent with the goals of the community relative to base reuse and to maximize the opportunity for citizen involvement with base reuse. We would like that community advisory report. Just like the final reuse

PM-23

PM-23.1

plan says. Unfortunately, the West Campus Upper Plateau warehouse complex represents the economic interests of Orange County developers, multi-national e-commerce firms and real estate investment trusts instead of local residents. Riverside `county residents will not own these warehouses. Riverside county owned businesses won't occupy these mega warehouses. Local residents, business owners and entrepreneurs will be harmed by this project, squeezed out, because of the gat businesses that will be put in. There is nothing in the EIR that this project will bring prosperity to our residents with the low paying jobs that are created here. This region is already over concentrated with the Good Move?? industry and the preapproved warehouses along the 215/60 corner are planted double already with the World Logistics Center, the Stoneridge Commerce Center and this plan. Double the existing footprint. We are completely dependent upon an industry enforced cheap goods from Asia via multi-national e-commerce companies with no concern for our regions wellbeing of prosperity. We have low paying temp jobs, traffic, pollution and endless business of ugly high hued Warehouses. Multi-national companies extract the profit. Our region lacks the economic resilience that comes with the diversification. We are vulnerable to trade slowdowns, trade wars and slow down imports from China. Those will go away when A.I. takes over with robots. We're going to have robot jobs, drone jobs in ten years. These warehouses are going to be lean mean, no job machines in ten years because of the technological changes. The draft EIR claims this project will produce 2,600 jobs with 8.9 jobs per acre in 2045 however the current average job rate for warehouses in the March JPA according to your own TAC report from 2022 is 8.8 jobs per acre. Are you telling me there's going to be no more automation in 20 years. There's going to be 5 jobs per acre at best. You're not going to produce 2,000 jobs on this land. Please reject this project. Please form a community advisory board of local residents to actively collaborate in project decision making so we can map out a plan that will help our region to prosper. This could be a win, win rather than a lose, lose. I urge you to be economic patriots, chauvinists for local economic development. Thank you very much for your time.

PM-23 Cont.

PM-23.1 Cont.

PM-23.2

PM-23.3

43:18

23. Connie Ransom

Good evening to you Joint Powers, this group that has a big job to do. Thank you for allowing us time tonight to share with you our concerns. I am not a resident of Orangecrest. I'm a resident of the United States, the state of California and the city of Riverside. My name is Connie Ransom, I've loved in Riverside for over 50 years, I've lived downtown in the wood streets and currently in Canyon Crest. What happens in Orangecrest/Mission Grove, Moreno Valley, Perris the whole county of Riverside affects me and affects all of Riverside. The project that has been put on the table without apparently a lot of input from the neighbors is a project that affects every part of Riverside. We are not isolated bubbles. The air we breathe is shared by everybody. I'm wondering if you know what a little lake in north of Minnesota called Lake Ataska. What is has in common with the gulf of Mexico, the Mississippi river, this project is in the March Joint Powers area affects the lakes and the streams along the Santa Ana. The water that runs off the parking lots that are currently along Sycamore Canyon comes down the Vicarian stream. A blue line stream which is to be protected and that stream goes all the way through Riverside. Goes through Canyon Crest Country Club. It goes through Victoria Club and it exits by Mt. Rubidoux and the Bonaminio Park. That affects everybody. What lives on it, what breathes around it affects everybody. Please do the right thing and not move forward with another warehouse.

PM-24

PM-24.1

39:48

24. Andrew Silva

I'm Andrew Silva, finding some people have lived in Orangecrest longer than I have goes by fast when you hear things like, I've been here for 30 years. I've lived in Riverside for 40 years and the Inland Empire for my whole life. The last time I spoke to you guys I gave you props for your public service and with that comes this tremendous responsibility, sitting on the County Board of Supervisors you probably go through a thousand consent items each year but these moments count when you have to make a very important or difficult decision that affects literally thousands of lives and that's what this project does. Just a brief moment to celebrate what we're doing here today. Think about folks in Ukraine without water or electricity and getting blown up just because they're there. Think about the young women in Iran who are facing bullets and gallows over a head scarf, reaching for a little bit of freedom so a cost for us for being here today. As already stated and ditto to previous comments, we're not knee-jerk anti-growth folks. I have sat through an hour meeting because the community did not want a Dollar Store because it was going to ruin the character of the community. We're not those people. We're ok with growth and development it's just that the Inland Empire is being treated like the red-headed step child of the West Coast. We're being treated like a third world country. We have land and we have bodies. So many times I've seen bad projects sacrifice a neighborhood or community on the offer of jobs. It's ok if these were good jobs and as already stated these are not never good jobs and they are going to go away with automation. We're going to have thousands of acres tied up. Debates on public land you'll often hear on how much is too much. We've protected a million acres of the desert, why do we have to protect 100,000 acres more. Here it's like how little is too little. We have a handful of organized parks, we have Sycamore Canyon and this is just one and a half square miles of just this absolute jewel. In the middle of our neighborhood, Riverside needs open space, this area is worth protecting. Warehouses are just a horrible, horrible development. I'm an air quality guy, I can ditto how close you are to the emission source, the impact to your kids, my mountain biker friends who are out there at a young age with their hearts pumping 180 beats a minute with this particular matter a few hundred feet away. This is just bad land use planning. We could do good land use planning. Thanks again for your service and thanks everyone for being here.

PM-25

PM-25.1

36:30

25. Christine Heinmann

I'm part of RNOW and I'm opposed to the warehouses being built in our neighborhood down the street. I've been a 21 year resident of this community and I thinks it's already been mentioned all the aspects that it will impact such as pollution, all the traffic. I also teach at the community center right there and we have a lot of children that are at that park nearby. My other concern is that the property be used for something other than warehouses. My husband has spoken, we're not about having something there but the warehouses would just combat the problems we're having with traffic. I would appreciate that we consider something else, something that would benefit the community. Our recreational activities, something in that aspect of what we can propose in the future. Thank you.

PM-26

PM-26.1

34:46

26. Cameron Barrius

My name is Cameron Barrius, a member of the Riverside Neighbors Opposing Warehouses. I'm opposed to the plan to build industrial warehouses on West Campus Upper Plateau. I'm asking to push the developer to consider an alternative plan and create a community advisory group. That being said, I mean you guys don't really give a damn about us. I mean he just said he was fighting for Meridian Parkway and that didn't work. People with cancer out here fighting for this. You guys just really don't a damn. I've seen movies where people like you could just have a meeting in the

PM-27

PM-27.1

PM-27.2

PM-27 Cont.

background secretly and we won't know anything about it. That's pretty shady. We don't know if that's going to happen. You guys moved the meeting all the way to Moreno Valley just to get us away, trying to separate us from work and this meeting. Forgive me, I'm scared. I just wanted to oppose this project the best way I could. Please and thank you for your time.

PM-27.2 Cont.

32:35

27. Donna Lloyd

PM-28

My name is Donna Lloyd and I've been an Orangecrest resident since 1996 and I love the area. We have taken all of our dogs out to that land and walked them around all those bunkers, bicyclists are out there, wild life is out there. It's amazing and it's great exercise. You don't know where else to go to have that type of environment where you see the rabbits running and maybe an occasional coyote but they've pretty much been wiped out already because of all these warehouses. At least there's fencing now on Van Buren so I don't see them dead on Van Buren anymore, which is nice. Half of those warehouses from my personal observation aren't even occupied. You're going to plan on building more warehouses in our community, in our backyards and in another 5 or 10 years they're not going to be occupied and then there's going to be all kinds of problems with these empty warehouses in our backyards and I think you need to think about that because I don't think any of you consider your own personal situation if this was you. Do any of you live in Orangecrest? Yeah, do you live near where they're planning on building the warehouses because I don't think you would want to do that if you did. I think you would definitely be sitting here saying no, that's in my backyard, I'm not doing it. I think you need to consider that. You've heard this over and over tonight. I plan on joining RNOW tomorrow. I am not a member but I am going to be. Thanks for listening to us. I hope it helps.

PM-28.1

30:35

28. ???

PM-29

Good evening, thank you for listening to me. I wanted to bring up I'm one voice but if I could I would bring up a million voices from the wildlife community that is in that plateau. Coyotes, foxes, possums, skunks, squirrels, rabbits, gophers, rats, owls, hawks and all the birds and all the likes and on and on. If they could come and talk there would be a million voices up here. If we encroach on their homes, where will they go. They've got a couple of choices. In the street and be killed, most of them would be killed just like it was when all the building went in on Meridian and Van Buren. We would sit in the intersection and it was horrifying to watch. Or they are going to be in our homes or in our backyards, in our streets, in our front yards again and we all spent thousands of dollars unfortunately because we had to call pest control because we had gophers and rats and squirrels like crazy. It was like a parade going down the street. They need to stay in their home. This is their home and everyone needs to consider the wildlife. It's their home. Not only the animals that live on the ground but what about all of those who live above the ground. We have owls, hawks and birds need to feed too. It's the circle of life. Listen to the wildlife. Thank you.

PM-29.1

28:26

29. Mia Smith

PM-30

Hello, I'm Mia Smith and I just wish to speak to the land. This place isn't just the land anymore. It's value is really greater than any money that can be made from any development ever. You're probably getting tired of a bunch of speeches so I'll just talk about my experiences with this land. Last year I joined the Woodcrest mountain bike team and found that my love was just not for the idea but the place. It's a place that would give my team a variety of places and trails or varying difficulty so you could have the newer riders with the older riders. Being able to ride on this land has really

PM-30.1

PM-30 Cont.

helped me this past year. A few years back I was diagnosed with tourette syndrome which is a chronic tick disorder, which is hereditary. Riding has really helped me. I've been on medication for it since 3rd grade. I was able to quit this year because of my riding. It helped distract my mind. When I was on the medication it was hard for me to eat because of my ticks. Riding helps me use my energy in a more productive way. This land is home to numerous animals, some of which are verging on endangered. They're threatened. Thank you all for spending your time to consider these speeches that people have given and I hope you consider all that has been said and that soon we'll be safe.

PM-30.1 Cont.

PM-30.2

26:02

30. Joaquin Castilgos

Good evening, my name is Joaquin Castilgos, I am here as a member of RNOW and resident of the I.E. I'm here to ask March JPA to think about the plans they have for the West Campus Upper Plateau. Think about the impacts that it will have on the people and why we're out here today. This project has not had any type of community involvement or engagement. It's obvious that it doesn't because the plan does not include anything that the people want. I'm going to talk about my own experience as a community member that has been fighting warehouses in my own community. I live in the unincorporated area of Bloomington in San Bernardino county, an area that is flooded by warehouses. An area where it's not safe to walk the streets because trucks are going up and down at all times of the day even when kids are coming out of school. Bloomington used to be a nice area, a beautiful community and because of the greed of many people and because of the lack of engagement of the community we have been seeing the removal of community even last year a project was approved where more than a hundred houses and an elementary school was going to be removed to accommodate the building of a mega warehouse. I believe this is because we don't have courageous leaders in San Bernardino county and we have leaders who do not care about what the community thinks and what they feel the impacts would be. I feel like a lot of leaders look for the easy way out. How can we fix these economic problems, how can we get rid of this land as quick as possible and make the most money. But what you should really be thinking is how the community will be affected. How are the families going to be impacted, how is the Orangecrest community going to be impacted, the future of the schools, the churches and everyone who lives in those areas. As leaders in Riverside county you have the opportunity to be courageous and not look for the easy way out but to actually be creative to talk to your community, to think about 20 years in the future. This plateau will be a beautiful place for families to continue to enjoy. Thank you.

PM-31

PM-31.1

22:35

31. Andrew Larrett-Smith

Good evening, my name is Andrew Larrett-Smith, I'm a resident of Orangecrest and I wanted to comment this evening about the Meridian Business Park which is the name of the limited liability corporation that oversees the use of the JPA land, you can see the signs everywhere. I want to start with a bold statement which is to say that the Meridian Business Park does not exist. It's a falsity, a fiction, a fake, a fabrication. A figment of the developers imagine. The developers did not build a business park. They promised a business park but what the developers have built is an industrial park. If you got to Wikipedia, the source of all wisdom, you'll see the first comment on the pages, not to be confused with a business park for an entry in industrial park. It's a very different beast. The original general plan called for less than 10% of the plan to be developed by the March JPA as industrial zone. If this proceeds, I believe that nearly 30% or more of the land will end up designated as industrial and that's not including other land that is also being used for warehouses. This was not the intent. This is not what we, the residents were promised. This is not what has been communicated and it's in the very name of the development. There is no Meridian Business

PM-32

PM-32.1

PM-32 Cont.

Park. Now, Meridian Industrial Park is seeking to move warehouses into the West Campus Upper Plateau. An area that was not originally designated to have any industrial zoning at all. Right into an area as so many of the residents have spoken tonight is surrounded on many sides, more than 3 sides. This is not what we were promised. It's been a bait and switch and so I ask you the commissioners, you have the power to ensure that the JPA lives up to its original commitments to the community and it develops the land that is consistent in a way in the original plan that is a business park and not an industrial zone that our kids will have to live with for generations. Thank you very much.

PM-32.1 Cont.

19:20

32. Lewis Allen

PM-33

Good evening, I'm Lewis Allen, I don't live in the Orangecrest area, I live in Mission Grove but I do have a problem with all these warehouses. I've been in the development industry for more than 40 years, I've worked in development from San Diego to Seattle, inspected projects from developers through the years, been in the industry since 1978 and lived here since 1988. I was part of the Presley homes when the put Hillcrest in. There was a sales agent that sat on the Hillcrest homes got all of 4 people a week to come in and look at those half acre lots so I've known this area for quite a while. I do have a problem with over building and over supply. I think somebody has been conned by the developers by showing all these statistics on the demand for warehouses especially transitional warehouses which are these mega warehouses which don't have very many if any alternative uses. Alternative uses are important for the community. Those transitional warehouses are only good for one thing and they are being over built in the Inland Empire as it is. Once the demand drops off, then you're going to have a bunch of huge warehouses that aren't going to be good for very much except indoor soccer play, or an archery range. I think you've heard a lot of compelling argumentas tonight from people that are very interested in how this land is going to be developed especially when being surrounded by residential especially when we're not enforcing the semi-truck issues on Alessandro and Van Buren. There's no plan to put designated lanes on the 215 for the trucks to go up and down the hill which is going to create more danger for traffic. I encourage you to re-look at this you're the representatives of the people right, the developer is going to come in here and build his stuff and he's going to go home. Please take your decisions very carefully. Thank you.

PM-33.1

17:11

33. Tim Martin

PM-34

Good evening, my name is Tim Martin and I prepared no remarks and had no intention of speaking and will not go on for my entire three minutes. I want to share with you an impression I have sitting in this meeting tonight. I came just to listen and support my wife and other friends. I have sat through hundreds of public board meetings as you all have as well. We live in a society that is extremely polarized which I know you're all aware of. But tonight you have not heard one voice of dissent. Not one about the desire to not have industrial parks in this land. Not one person has come up and sad, you know I kinda like this idea. You have heard compelling, poignant, moving comments from every single speaker and at the end of the night when you can't remember everything that was said you must have an indelible impression that the people who live in this neighborhood are completely united in the opposition of your plans.

PM-34.1

15:24

34. Melissa May

PM-35

My name is Melissa May and I'm a resident of the Inland Empire. I've lived here my whole life and I'd like to take a moment to thank all the people that have showed up tonight. It takes incredible courage to speak on behalf of you community and be a true representative of the issues you're facing. To talk about everything that you're experiencing as a family and what your neighbors are going through. Everyone that has spoken here today can make positive change and can affect that change. I won't be speaking so much about my experiences here because I know they're going to fall on deaf ears. In fact, I'm going to speak to the community today. If you spoke here tonight, get ready for 2024. You're a true leader and it should be you in those seats.

PM-35.1

13:44

35. Bryton Mays

PM-36

Good evening everyone, I want to start by saying that I respect everyone here and what they're trying to achieve to Jen Larrett-Smith, the RNOW organization as well as the other organizations that have shown up today and taken the time and energy and effort to stand up for what you believe is right for your community. To the March JPA commission to be able to listen to the multitude of different stakeholders who have different wants me needs and agendas. Thank you for taking on that leadership role. Your motto is bringing good jobs to Riverside county and that is a goal that I support fully. My name is Bryton Mays and I've come to you all today as many things. I'm a veteran, a traveler, a graduate student and a sustainability consultant. I've spent years of my life devoted to this country into getting the necessary education and experience to be able to have conversations like this one. I am also one of 15% of Riverside's citizens who has asthma and only moved to the West Coast last year from the East Coast with my partner was in the military. Immediately upon arriving as with any big move, we noticed some big differences. We learned what California traffic was like and that because you are only 55 miles away from LA does not mean it won't be three hours away. We also learned what it felt like to live in a place with terrible air quality. It didn't take long for my asthma to start acting up and I found myself struggling to do one our most basic functions, to breathe. Now I'm told that this project will bring more than 35,000 vehicle trips per day to an area that currently has none which means that 35,000 car tires rubbing off micro-plastics into the air, 35,000 engines coughing out green-house gases into the air our loved ones breathe, 35,000 more cars clogging up the highways. Let me be clear that I am not anti-business, I am pro sustainable business and I support the creation of full time jobs that the plan proposes to bring. Anytime an organization, an individual or system chooses to focus on profits alone there are externalities associated with that. In this case the price we're paying is the air we breathe, the noise that neighborhoods will endure and more. I can be sure that these affects will be significant and unavoidable because the recently published EIR even with all mitigation possible being considered says so time and time again. Over a hundred times are this projects impacts referred to as significant and unavoidable in the Environmental Impact Report. Some of them being the air quality that we are breathing right now in this room. Is it possible to find an alternative plan that will still bring full time jobs while not making it harder for the community to breathe. The EIR lists four alternatives. First one being the most environmentally friendly in that being to cancel the project all together. The second one was the environmentally superior alternative to the proposed plan and that to me sounds like it cold bring good jobs to Riverside county while lessening the associated significant and unavoidable environmental impacts. Now that we know more environmentally friendly plans exist I guess the real question is this are we open considering an alternative more sustainable plan. Thank you.

PM-36.1

PM-36.2

10:37

36. Melody Clark

PM-37

Hello, I'm Melody Clark, I'm with RNOW and I live in Riverside. I don't live in Orangecrest but of course this project affects me just as much. You've heard many things tonight and all sorts of areas have been brought up but I want to emphasize and that is the area of jobs. The reason why I want to emphasize that area is that not as the justification given for this project it's the only justification of this project. You all acknowledged that the air quality, traffic, all of these things are negative impacts but because there are jobs involved that it is justification for this. People have talked already tonight and I think you all understand that these are not good jobs, they are all low paying jobs, they are low benefit jobs, there's really no opportunity for people in these jobs to unionize to make them better jobs. The biggest problem is automation which means that these jobs will be gone and there will be no jobs and it's 20 years away or even 10 years away, it's sooner than that. There will be no jobs, that means there's justification for this project. I would like you to reconsider your motto of bringing good jobs to Riverside county and this project. Thank you.

PM-37.1

8:43

37. George Hague

PM-38

Hello, Prop 13 is a problem for jurisdictions futures that rely on tax bases. I've lived in my house for over 45 years and my property taxes are much less than my neighbors who moved in only two years ago. I'm sure my homes property taxes no longer covers the impact of my city. When Prop 13 was first imposed they knew that property taxes would no longer even cover their costs of impacts to the jurisdictions in which they were situated. This will be especially true for those cement boxes we call warehouses which I'm sure will last much longer than my house or myself. You need to think long term and not approve projects which will not come close to covering the costs to government services. Warehouses currently provide very few jobs per square feet compared with other businesses and those numbers per square feet are becoming smaller every year with increase of robotics and automation. These cement boxes will be around for decades after decade. Therefore every warehouse you approve, you're causing our area workforce to commute because land that could have been providing living wage jobs has been replicated to cement warehouse boxes filled with robotics and automation. Your approval of this warehouse will result in this project site not paying its fair share of taxes in the very near future causing it to be a drain on government services. Cumulative impacts will be great. A lot of the diesel trucks from this will head north to state route 60. I215 right now is already backed up for miles and miles almost every day. The World Logistics Center, the 40 million square foot warehouse project in Moreno Valley is going to be breaking ground this year. It is estimated that 13,000 daily diesel trips will be produced each day by this one project. State Route 60 is already a total mess with diesel trucks.

PM-38.1

PM-38.2

PM-38.3

5:04

38. ???

PM-39

My heart is racing, I wasn't expecting to speak but I've been very inspired by everybody. I've been in Riverside for 34 years. I've moved out of Riverside a few times. I was a sick child with pretty bad asthma. I couldn't run, always got made fun of because my mile was usually the longest mile. I have moved to northern California and have been in nature and have healed myself. I no longer use an inhaler. I moved to Memphis and have moved around but I have always come back to Riverside. It's special here. My mom worked on the RCA preserving 500,000 acres of wildlife, I know Kevin Jeffries knows my mom. Riverside actually has more endangered species than anywhere in the United Stated except for Hawaii so it is special. I recently walked the area recently that we are all talking about to sit and meditate and connect with the land and see what it would be like if huge warehouses were there and as I close my eyes I hear the bird and the peace. We don't get this in LA. We don't get this in San Diego, places I've lived. I really feel for the community, I feel for the children of the

PM-39.1

PM-39.2

PM-39.3

PM-39 Cont.

future. We are the voice for right now. I don't know what is right. I think a restaurant in Riverside would be really cool. I just saw the dog park and that's exciting. I know that we need jobs and businesses and I would volunteer to be on the committee. Unity can be our word for the year. I care deeply about people and what happens in our neighborhood. Please be our voice and make a difference. Thank you

PM-39.3 Cont.

PM-40

8:33 Chair Conder closed public comment and stated that he would like to thank everyone for coming down. He encouraged everyone to read the EIR. The open space will remain. He stated that they are working on doing a public meeting in the Orangecrest area within the next few weeks as soon as they get the logistics down. This was the first place they could get. We will a break between 8:33 and return at 8:45.

PM-40.1

"Bringing Good Jobs to Riverside County"
MARCH JOINT POWERS AUTHORITY

Grace I. Martin, DPPD
Executive Director
14205 Meridian Parkway, Suite 140
Riverside, CA. 92518
w: (951) 656-7000
martin@marchjpa.com
www.marchjpa.com

PM-1. Kristine Doty
January 11, 2023

PM-1.1 This comment expresses general opposition to the Project, raises general concerns about air quality, noise and aesthetics impacts and public engagement. As explained in Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The Draft EIR assessed the Project's health risks in Recirculated Section 4.2, Air Quality, and Appendix C-2. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks . Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts.

The Draft EIR included a Noise and Vibration Impact Analysis (Appendix M-1) prepared by Urban Crossroads in October 2022. Based on the findings of the noise study, the EIR determined the Project would result in less than significant construction noise impacts. As detailed further in Section 4.11, Noise, of the Draft EIR, the impact analysis is based on quantifiable thresholds and relies on existing regulations and project design features to reduce impacts. The Project would have less than significant impacts due to construction noise and no mitigation is required. The Project includes PDF-NOI-1 through PDF-NOI-3, which would limit the hours of construction and blasting and drilling

activities. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. With regard to on-site operational noise, the Draft EIR determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant. Section 4.11, Noise, of the Draft EIR evaluated the mitigation potential of rubberized asphalt but determined such a measure would not lower off-site traffic noise levels below the level of significance for Roadway Segment #13, so the Project's noise impacts for Roadway Segment #13 is significant and unavoidable.

Regarding aesthetics impacts, please see Topical Response 1 – Aesthetics.

March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the project site resulting in 2,172 public notices.

The comment further requests consideration of an alternative without warehouses. As such, in response to this comment, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

The comment additionally requests the creation of a community advisory group. Creation of an advisory group is outside the scope of CEQA.

PM-2. Gabriella Mendez
January 11, 2023

PM-2.1 This comment expresses general opposition to the Project and requests the inclusion of a non-industrial alternative. In response, please see Topical Response 8 – Alternatives.

PM-2.2 This comment questions wage rates for warehouse workers. This comment does not raise any issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

PM-2.3 This comment expresses concern about existing aircraft emissions and health hazards from increased truck traffic. Existing emissions and air quality are part of the existing baseline. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. Recirculated Section 4.2, Air Quality, and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks . Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts.

PM-2.4 This comment expresses general opposition to the Project and concern about loss of recreational open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. The comment further requests consideration of an alternative site or plan. In response to this comment, please see Topical Response 8 – Alternatives.

PM-3. Abdallah Karim
January 11, 2023

PM-3.1 This comment requests the inclusion of a non-industrial alternative. In response, please see Topical Response 8 – Alternatives.

PM-3.2 This comment expresses concerns about the degree RNOW is being heard and identifies general opposition to the Project. The comment also raises general concerns about the Project's impacts on air quality, traffic and schools. This comment does not raise any issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. The comment additionally requests the creation of a community advisory group. Creation of an advisory group is outside the scope of CEQA. As such, no further response is provided.

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PM-4. Susan Nipper
January 11, 2023

PM-4.1 This comment expresses general opposition to the Project and does not raise any issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

PM-4.2 This comment expresses concern about the health risks associated with Project air emissions. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. Recirculated Section 4.2, Air Quality, and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks . Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts.

PM-4.3 This comment is directed to decision makers about the Project and does not raise any issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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PM-5. Jerry Shearer
January 11, 2023

PM-5.1 This comment expresses general opposition to the Project and concerns about public engagement. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the project site resulting in 2,172 public notices. The comment does not raise any issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

PM-5.2 This comment incorrectly describes the square footage of development analyzed as the Specific Plan buildout scenario in the Draft EIR. The Specific Plan buildout scenario is not fully warehouse use but rather 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. Additionally, the comment requests consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives.

PM-5.3 This comment expresses general opposition to the Project and does not raise any issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. The comment additionally requests the creation of a community advisory group. Creation of an advisory group is outside the scope of CEQA. As such, no further response is provided.

PM-5.4 This comment states that the Draft EIR is faulty but does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. Additionally, the comment requests consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives.

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PM-6. Jennifer Larrett-Smith
January 11, 2023

PM-6.1 This comment expresses general opposition to the Project and requests consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives.

PM-6.2 This comment expresses concern about the health risks associated with Project air emissions. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. Recirculated Section 4.2, Air Quality, and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks . Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts.

PM-6.3 This comment requests the consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives. The comment additionally requests the creation of a community advisory group. Creation of an advisory group is outside the scope of CEQA.

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PM-7. Eric Carlson
January 11, 2023

PM-7.1 This comment raises concerns about loss of recreational open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. The comment further requests consideration of an alternative site. In response to this comment, please see Topical Response 8 – Alternatives.

PM-7.2 This comment discusses wildlife seen on the Project site, including owls, falcons, hawks, raccoons, rats, rabbits, a pack of coyote, and a variety of snakes. Impacts to special status wildlife are discussed in Section 4.3, Biological Resources of the Draft EIR as well as within the Project Biological Technical Report (Appendix D-1). As explained in the Rocks Biological Resources Responses to Comments (Appendix D-2), biological evaluation of the Project site and observed species lists were not intended to be exhaustive, but to provide sufficient information for decision makers to understand the environmental consequences of the proposed Project. Impacts on native vegetation communities were assessed as part of the analysis and mitigation is provided for those impacts; much like NCCP planning, it is generally assumed that habitat mitigation also protects more common (non-special status) species that those habitats support, such as those identified by the comment.

As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

PM-7.3 This comment asks that the site remain undeveloped. Evaluation of the No Project Alternative, where the site would remain undeveloped, is included in Chapter 6, Alternatives, of the Draft EIR. While the No Project Alternative would avoid potential impacts, this alternative would not meet the basic objectives for the Project.

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PM-8. John Lyell
January 11, 2023

PM-8.1 This comment requests consideration of non-industrial alternatives, including an alternative similar to the Great Park in Orange County. In response, please see Topical Response 8 – Alternatives, which discusses Great Park.

PM-8.2 This comment requests the formation of an advisory group and does not raise any issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. Formation of an advisory group is outside the scope of CEQA. As such, no further response is provided.

PM-8.3 This comment expresses concerns about utilities and infrastructure, and specifically streets, water, and electricity. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Section 4.17, Utilities and Service Systems, of the Draft EIR analyzed the Project's impacts to water, electricity, and other utilities and determined the Project's impacts to be less than significant.

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PM-9. Sophia Guzman
January 11, 2023

PM-9.1 This comment discusses bicycle safety and economic concerns. The Project would accommodate existing and future local transit service, bicycle lanes, and pedestrian facilities. The Specific Plan Area includes a bicycle and pedestrian circulation network to connect to existing facilities and provide internal access. At Project buildout, sidewalks would be constructed on all internal roadways along the individual parcel's frontage. In addition, 6-foot bike lanes and 6-foot sidewalks would be included on internal streets such as Linebacker Drive, Airman Drive, Bunker Hill Drive, and Arclight Drive. The emergency vehicle access driveway would also serve as a pedestrian and bicyclist connection from Barton Street to Cactus Avenue to provide a linkage to the Specific Plan Area and the Metrolink station to the east of the Project site. The comment does not raise any issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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PM-10. Christopher Neilson
January 11, 2023

PM-10.1 This comment requests the consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives.

PM-10.2 This comment questions wage rates for warehouse workers and the number of jobs that would be generated by the Project. In response to this comment, please see Topical Response 5 – Jobs.

PM-10.3 This comment discusses general opposition to the Project and potential noise impacts. The Draft EIR included a Noise and Vibration Impact Analysis (Appendix M-1) prepared by Urban Crossroads in October 2022. Based on the findings of the noise study, the EIR determined the Project would result in less than significant construction noise impacts. As detailed further in Section 4.11, Noise, of the Draft EIR, the impact analysis is based on quantifiable thresholds and relies on existing regulations and project design features to reduce impacts. The Project would have less than significant impacts due to construction noise and no mitigation is required. The Project includes PDF-NOI-1 through PDF-NOI-3, which would limit the hours of construction and blasting and drilling activities. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. With regard to on-site operational noise, the Draft EIR determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant.

The comment further expresses general opposition to the Project and concern about loss of recreational open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses.

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PM-11. Aaron Bushong
January 11, 2023

PM-11.1 This comment expresses general opposition to the Project and concerns regarding public engagement regarding development decisions. For the Project, March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the project site resulting in 2,172 public notices. The comment does not raise any issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

The comment further identifies airplane crashes, warehouse fires, and trucks on residential streets as potential problems. Airplane crashes are an anomaly and rarely occur. However, given the Project's proximity to the March Inland Port Airport, the risk of airplane crashes remains. The Riverside County Airport Land Use Commission (ALUC) reviews projects to maximize consistency with airport land use plans for projects within close proximity to an active airstrip. This Project has undergone review by ALUC, as discussed in Recirculated Section 4.10, Land Use and Planning. ALUC provided their consistency determination in a letter dated May 16, 2022, which is included within Appendix L of the Draft EIR.

Additionally, as detailed in Recirculated Chapter 3, Project Description, and Topical Response 6 – Meridian Fire Station, the Project will construct the new Riverside County fire station at Meridian Parkway and Opportunity Way. The provision of a new fire station within the Meridian Business Park will allow for more rapid response to any potential future warehouse fire. Given existing fire mutual aid agreements serving March JPA, the Project site would be adequately served by fire protection services through the buildout of the Specific Plan.

The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway.

Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

PM-11.2 This comment requests the consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives. The comment additionally requests the creation of a community advisory board. Creation of an advisory board is outside the scope of CEQA.

PM-12. Gregory Garnier
January 11, 2023

PM-12.1 This comment expresses general opposition to the Project and concerns regarding the Barton Street extension, air quality and traffic impacts. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

PM-12.2 This comment requests the consideration of non-industrial alternatives that includes more open space and the creation of an advisory committee. In response, please see Topical Response 8 – Alternatives. Creation of an advisory committee is outside the scope of CEQA.

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PM-13. Amy Dahdul
January 11, 2023

PM-13.1 This comment expresses general opposition to the Project and requests the consideration of non-industrial alternatives and the creation of a neighborhood advisory committee. In response, please see Topical Response 8 – Alternatives. Creation of an advisory committee is outside the scope of CEQA.

PM-13.2 This comment discusses the cost of living in the Project vicinity and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

PM-13.3 This comment expresses general opposition to the Project and concern about loss of recreational open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. This comment requests the consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives.

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PM-14. Michelle Rodriguez
January 11, 2023

PM-14.1 This comment discusses personal experiences and raises concerns regarding health impacts. See Response PM-14.2, below.

PM-14.2 This comment discusses the health effects of diesel particulate matter. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. Recirculated Section 4.2, Air Quality, and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks . Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts.

PM-14.3 This comment requests the consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives. The comment additionally requests the creation of a community advisory group. Creation of an advisory group is outside the scope of CEQA.

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PM-15. Christine Martin
January 11, 2023

PM-15.1 This comment discusses general air quality, noise, and traffic impacts and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. The Draft EIR included a Noise and Vibration Impact Analysis (Appendix M-1) prepared by Urban Crossroads in October 2022. Based on the findings of the noise study, the EIR determined the Project would result in less than significant construction noise impacts. As detailed further in Section 4.11, Noise, of the Draft EIR, the impact analysis is based on quantifiable thresholds and relies on existing regulations and project design features to reduce impacts. The Project would have less than significant impacts due to construction noise and no mitigation is required. The Project includes PDF-NOI-1 through PDF-NOI-3, which would limit the hours of construction and blasting and drilling activities. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. With regard to on-site operational noise, the Draft EIR determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

PM-15.2 This comment requests the consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives.

PM-15.3 This comment requests the formation of an advisory group and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. Creation of an advisory committee is outside the scope of CEQA. As such, no further response is provided.

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PM-16. Lewis Lopez
January 11, 2023

PM-16.1 This comment expresses general opposition to the Project and concern about loss of recreational open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses.

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PM-17. Anthony Noriega
January 11, 2023

PM-17.1 This comment is introductory in nature and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

PM-17.2 This comment asserts that the air quality impacts are not properly mitigated and that the EIR includes older data. The data used to report existing air quality conditions is what was available by the South Coast Air Quality Management District at the time the EIR was prepared. The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Please see Recirculated Section 4.2, Air Quality, where a discussion of mitigation measures either being enhanced or added to the Project is provided.

PM-17.3 This comment expresses general opposition to the Project and requests the consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives.

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PM-18. Alice Musumba
January 11, 2023

PM-18.1 This comment expresses general opposition to the Project and the commenter shared her personal health story and concerns regarding health risk. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. Recirculated Section 4.2, Air Quality, and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts.

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PM-19. Anthony Scimia
January 11, 2023

PM-19.1 This comment discusses existing nighttime noise generated by surrounding development. These are existing sources of noise and are not associated with the proposed Project. The Draft EIR analyzed the nighttime noise sources identified by the commenter and determined impacts would be less than significant. As shown in Table 4.11-1, 24-Hour Ambient Noise Level Measurement Results, of the Draft EIR, nighttime (10:00 pm to 7:00 am) ambient noise levels at locations surrounding the Project site range from 43.9 dBA L_{eq} to 56.6 dBA L_{eq}. Table 4.11-7 summarizes the significance thresholds for operations near noise-sensitive receivers. Under the Specific Plan buildout scenario, the Draft EIR evaluated nighttime noise sources from Project activities, including loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements and truck movements. These sources include the noise sources identified by the commenter, such as back-up alarms, people talking, and doors being closed. As shown in Tables 4.11-27 and 4.11-29, the Project will not exceed the nighttime noise thresholds at any receiver location.

Under Table 3-2, Development Standards, and Section 4.4.2, Truck Courts and Loading Docks, of the proposed Specific Plan, truck courts and loading docks must be oriented away, or screened from surrounding residential land uses, which will reduce noise impacts through attenuation. Section 4.4.1, Walls and Fences, of the proposed Specific Plan requires screen walls around the perimeters of individual building sites, loading and dock areas, trailer parking areas, and parking lots, further attenuating Project noise sources. The Project is subject to the March JPA Development Code Section 9.10.140, which states “any loudspeaker, bells, gongs, buzzers, or other noise attention or attracting devices shall not exceed 55 dBA at any one time beyond the boundaries of the property. Sounds emitting from any of the aforementioned devices, including or live or recorded music, shall cease between the hours of 10:00 p.m. and 7:00 a.m. if the sound therefrom creates a noise disturbance across the property line of a residential use.” Section 3.5.4 Off-Street Loading Facilities, of the Specific Plan also includes this restriction. Additionally, the Project includes the Conservation Area, which would serve as a buffer between the Project and residences. Project nighttime noise impacts would be less than significant.

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PM-20. Kevin Heinmann
January 11, 2023

PM-20.1 This comment expresses general opposition to the Project and requests the consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives.

PM-20.2 This comment discusses general air quality, noise, and traffic impacts and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27.

The Draft EIR included a Noise and Vibration Impact Analysis (Appendix M-1) prepared by Urban Crossroads in October 2022. Based on the findings of the noise study, the EIR determined the Project would result in less than significant construction noise impacts. As detailed further in Section 4.11, Noise, of the Draft EIR, the impact analysis is based on quantifiable thresholds and relies on existing regulations and project design features to reduce impacts. The Project would have less than significant impacts due to construction noise and no mitigation is required. The Project includes PDF-NOI-1 through PDF-NOI-3, which would limit the hours of construction and blasting and drilling activities. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. With regard to on-site operational noise, the Draft EIR determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant.

The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

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PM-21. Pete Elliott
January 11, 2023

PM-21.1 This comment expresses general opposition to the Project and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided. The comment further questions the public participation process. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices.

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PM-22. Honey Bernas
January 11, 2023

PM-22.1 This comment expresses general opposition to the Project and concerns regarding health risks. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. Recirculated Section 4.2, Air Quality, and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks. Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts.

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PM-23. Mike McCarthy
January 11, 2023

PM-23.1 This comment expresses general opposition to the Project and requests support for local business, citizen involvement, regional prosperity, and economic resilience. The comment does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

PM-23.2 This comment questions the number of jobs the Project would create and impacts of future automation. In response to this comment, please see Topical Response 5 – Jobs. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

PM-23.3 This comment requests the formation of a community advisory board and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. Creation of an advisory board is outside the scope of CEQA. As such, no further response is provided.

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PM-24. Connie Ransom
January 11, 2023

PM-24.1 This comment expresses general opposition to the Project and concerns regarding a blue line stream and Sycamore Canyon. The proposed project site and Sycamore Canyon are now separated by residential development and Alessandro Blvd. It appears that water from the project site flows down Avenida Munoz, Camino Del Sol, and several concrete drainages prior to flowing under Alessandro Blvd through culverts to Sycamore Canyon. The Upper Plateau Aquatic Resources Delineation Report (ARDR) identifies two areas that may have been historically connected to the Blue Line stream running through Sycamore Canyon; these are identified as non-wetland water (NWW)-1 and NWW-2 in ARDR figures.

Direct and indirect impacts on non-wetland waters of the U.S. identified on the project site are accounted for within the project impact analysis (please see sections 4.2 and 5.8 of the Project Biological Technical Report [Appendix D-1]) and the project will be permitted through the Army Corps of Engineers, CDFW and the Regional Water Quality Control Board. All requirements by the agencies during permitting, including best management practices as it pertains to water quality, will be adhered to. Impacts would be less than significant with mitigation incorporated.

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PM-25. Andrew Silva
January 11, 2023

PM-25.1 This comment expresses general opposition to the Project and raises concerns regarding automation, loss of recreational open space, and health risks associated with Project emissions. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses.

Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. Recirculated Section 4.2, Air Quality, and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks . Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts.

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PM-26. Christine Heinmann
January 11, 2023

PM-26.1 This comment expresses general opposition to the Project and requests the consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives.

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PM-27. Cameron Barrius
January 11, 2023

PM-27.1 This comment expresses general opposition to the Project and requests the consideration of non-industrial alternatives. In response, please see Topical Response 8 – Alternatives. The comment additionally requests the creation of a community advisory group. Creation of an advisory group is outside the scope of CEQA.

PM-27.2 This comment expresses general opposition to the Project and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided. The comment further questions the public participation process. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices.

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PM-28. Donna Lloyd
January 11, 2023

PM-28.1 This comment expresses general opposition to the Project and raises concerns regarding loss of recreational open space, impacts to wildlife, and warehouse vacancy rates. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. The comment alleged, based on personal observation, that half of the area warehouses are not occupied. This is inaccurate. While observable activity at these facilities may be low, they are occupied. According to Table 1 of the draft "Economic Impact Analysis of the March Joint Powers Authority (MJPA) Development Projects" by Dr. Qisheng Pan that presents 2023 employment data for the various existing developments within the March JPA Planning Area (Final EIR Appendix U), there are few to no vacancies within the March JPA Planning Area.

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PM-29. Unknown
January 11, 2023

PM-29.1 This comment expresses concerns about impacts to the wildlife on the Project site. In response, please see Section 4.3, Biological Resources, of the Draft EIR where impacts to wildlife species are discussed. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. Impacts to biological resources would be less than significant with mitigation incorporated.

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PM-30. Mia Smith
January 11, 2023

PM-30.1 This comment expresses concern about loss of recreational open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses.

PM-30.2 This comment expresses concerns about impacts to the wildlife on the Project site. In response, please see Section 4.3, Biological Resources, of the Draft EIR where impacts to wildlife species are discussed. The Conservation Easement will be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. Impacts to biological resources would be less than significant with mitigation incorporated.

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PM-31. Joaquin Castilgos
January 11, 2023

PM-31.1 This comment expresses general opposition to the Project and concerns regarding public engagement. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the project site resulting in 2,172 public notices. The comment does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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PM-32. Andrew Larrett-Smith
January 11, 2023

PM-32.1 This comment expresses general opposition to the Project and discusses the General Plan designations. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses. The comment also expresses concerns about the Project becoming a warehouse/industrial site as opposed to a business park. As indicated in the Specific Plan, both industrial and business park uses are considered for the Project site, and as discussed in Topical Response 8 – Alternatives, a non-industrial office park alternative is considered.

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PM-33. Lewis Allen
January 11, 2023

PM-33.1 This comment expresses general opposition to the Project and raises concerns regarding warehouse vacancy and truck route enforcement. According to Table 1 of the draft "Economic Impact Analysis of the March Joint Powers Authority (MJPA) Development Projects" by Dr. Qisheng Pan that presents 2023 employment data for the various existing developments within the March JPA Planning Area (Final EIR Appendix U), there are few to no vacancies within the March JPA Planning Area. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

The comment further requests designated truck lanes on I-215 for traffic safety. Improvements to I-215 are under the jurisdiction of Caltrans; neither March JPA nor the developer have the authority to implement such improvements. Regarding I-215 traffic safety, as explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), to improve regional operational conditions, Caltrans, in conjunction with the Riverside County Transportation Commission, has completed a number of I-215 Freeway regional improvement projects. The I-215 Freeway South project widened I-215 to provide an additional general-purpose lane in each direction between Murrieta Hot Springs Road and Scott Road. The I-215 Central project widened I-215 to provide an additional general-purpose lane in each direction between Scott Road and Nuevo Road. The latest improvement along the I-215 Freeway corridor is the new interchange at Placentia Avenue that was completed in late 2022. A future planned I-215 Freeway North project proposes to add one carpool lane in each direction of travel between Nuevo Road and the SR-60 Freeway in addition to implementing a new westbound auxiliary lane to improve traffic merging with the SR-60 Freeway. Another regional facility is the Mid-County Parkway (MCP) which is an east-west transportation corridor generally running along the alignment of Ramona Expressway. The first phase of the MCP includes the recently completed Placentia Avenue interchange at the I-215 Freeway and the second phase is currently under design and is anticipated to go into construction in 2025. The second phase of the MCP project will construct an additional lane in each direction (in addition to other design features along the corridor) between Pico Avenue and Warren Road along Ramona Expressway.

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PM-34. Tim Martin
January 11, 2023

PM-34.1 This comment expresses general opposition to the Project and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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PM-35. Melissa May
January 11, 2023

PM-35.1 This comment expresses general opposition to the Project and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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PM-36. Bryton Mays
January 11, 2023

PM-36.1 This comment discusses the health effects of air pollution and expresses concern about the increased vehicle trips and resulting air emissions associated with the Project. Recirculated Section 4.2, Air Quality, has disclosed the Project's air quality impacts, applied an appropriate threshold of significance, and determined the Project's impacts to be significant and unavoidable even with implementation of MM-AQ-1 through MM-AQ-27. Recirculated Section 4.2, Air Quality, and Appendix C-2 assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks . Please see Recirculated Section 4.2, Air Quality, for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's significant and unavoidable air quality impacts.

PM-36.2 This comment requests the consideration of non-industrial alternatives and also cites the No Project Alternative and Alternative 2 – Reduced Development Alternative, which the Draft EIR identified as the environmentally superior alternative. Chapter 6, Alternatives, of the Draft EIR evaluated the No Project Alternative and Alternative 2. Additionally, please see Topical Response 8 – Alternatives for the evaluation of Alternative 5, Non-Industrial Alternative.

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PM-37. Melody Clark
January 11, 2023

PM-37.1 This comment states that the jobs that would be generated by the Project are not quality jobs and would eventually be replaced by automation. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. This comment does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. Please see Topical Response 5 – Jobs for more discussion.

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PM-38. George Hague
January 11, 2023

PM-38.1 This comment expresses general opposition to the Project and concerns regarding the Project not paying its fair share and future automation. PDF-TRA-4 requires the Project to contribute its fair share to address operational deficiencies at off-site intersections. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR. The comment does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

PM-38.2 This comment states that cumulative impacts will be great. The environmental analysis through Chapter 4 of the Draft EIR evaluated cumulative impacts associated with the Project. See also Topical Response 7 – Cumulative Projects.

PM-38.3 This comment expresses concern about increasing truck traffic. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

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PM-39. Nicole Bernas
January 11, 2023

PM-39.1 This comment is introductory in nature and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

PM-39.2 This comment expresses concerns about impacts to the wildlife on the Project site. In response, please see Section 4.3, Biological Resources, of the Draft EIR where impacts to wildlife species are discussed. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. Impacts to biological resources would be less than significant with mitigation incorporated.

PM-39.3 This comment provides general discussion about the Project vicinity and requests the formation of an advisory committee. The comment does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. Creation of an advisory committee is outside the scope of CEQA. As such, no further response is provided.

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PM-40. Chair Conder
January 11, 2023

PM-40.1 This comment encourages meeting attendees to read the Draft EIR. The comment does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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From: Dan Fairbanks <fairbanks@marchjpa.com>
Sent: Thursday, April 6, 2023 11:26 AM
To: Timothy Reeves; Adam Collier; Nicole Cobleigh
Cc: Dr. Grace Martin; Rodney McCraine
Subject: Public Comments from February 8, 2023

All,

The following is from the public comments from the February 8 JPC meeting, and should be included in the response to comments:

PM-41

1. Andrew Silva – Thanked the commission for having a night meeting. He is opposed to the West Campus Upper Plateau project. PM-41.1

PM-42

2. Mike McCarthy – I have read through the EIR and I really think that it's missing a key component of the cumulative impacts analysis and really it's the fact that there is a ton of warehouses so I made this map and I also sent you all a link to this map because it's also on the website and it shows all the approved and planned and existing warehouses along the 215/60 corridor and the EIR table 4-2 shows a cumulative impacts lists project and it shows stuff right here. OK. Are region is not just here and since this bodies comprised of numbers from the City of Moreno Valley, the City of Perris, you have incorporated county areas of Mead Valley and also the City of Riverside and I think that the appropriate regional analysis is of course here and if you do that we are missing about 3,500 acres of approved and existing warehouses. Ok. So this one alone is 2,600 acres, this one is 900 acres. Ok. So, if we assume that those are 10 jobs per acre that's 35,000 jobs, those aren't included in the cumulative impacts analysis of jobs. How many people need to move out here to have all those jobs because we don't have any unemployed people right now. We have the lowest unemployment in this county's history as long as drivers have been taken and nationally the lowest unemployment numbers so who's going to take all these 35,000 warehouse jobs that are coming out here because there's nobody to take them right now. What about the air quality, the regional air quality analysis, what about the traffic analysis. There are 20,000 trucks from this project alone another 5,000 trucks from this project. I'm not even counting or incorporating the ones from, the City of Perris, Moreno Valley, right here. There's a lot of warehouses already here. We need to take all of them into account. Specifically, along the 215/60 corridor. That's why I want to talk about the transportation analysis. The transportation analysis right now stops as soon as the trucks go on the freeway, as soon as the cars go on the freeway. It doesn't model the 215/60 freeway at all, and I don't know how you can have a transportation analysis as legitimate in this area when you don't include our major backbone infrastructure the 215/60 corridor which is blocked 6 hours a day by traffic right now before the 3,000 extra acres of warehouses are built over the next 5 years. I know that Andrew said that we shouldn't take into account the logistics are good or whatever but really it's just a sprawl right now, it's everything, we are 100 percent of our eggs in the logistics basket. Have a good day.

PM-42.1
PM-42.2
PM-42.3

PM-43

3. Adam Collier, Vice President, Meridian Park West, LLC stated there will be a community meeting regarding the Meridian West Upper Plateau project, February 9th, 6:30 p.m. at the March Field Air Museum. PM-43.1

PM-41. Andrew Silva
February 8, 2023

PM-41.1 This comment expresses opposition to the Project and does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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PM-42. Mike McCarthy
February 8, 2023

PM-42.1 This comment questions the scope of the cumulative analysis included in the Draft EIR. In response, please see Topical Response 7 – Cumulative Projects.

PM-42.2 This comment questions the number of jobs that the Project would generate as well as cumulative impacts regarding the long-term labor supply. In response, please see Topical Response 5 – Jobs.

PM-42.3 This comment discusses traffic concerns, and specifically cumulative traffic concerns along the 215/60 corridor. Please see Topical Response 7 – Cumulative Projects. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), March JPA has adopted its own guidelines for traffic analysis: the March JPA Traffic Impact Study Guidelines, dated February 10, 2020 (March JPA Guidelines). As March JPA is the lead agency for this Project, the 2022 Traffic Analysis was developed pursuant to the March JPA Guidelines, rather than the WRCOG or County of Riverside Transportation Planning guidance documents. Analysis of LOS was provided for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. As such, Caltrans does not utilize peak hour intersection operations analysis and instead utilizes VMT in compliance with SB 743 through its VMT-Focused Transportation Impact Study Guide (Caltrans VMT Guide), dated May 20, 2020. The March JPA Guidelines were adopted before the Caltrans VMT Guide and reference superseded Caltrans guidance. The 2022 VMT Analysis was prepared in compliance with the Caltrans VMT Guide and meets the transportation analysis requirement for Caltrans.

Pursuant to Caltrans safety requirements, the 2022 Traffic Analysis included an assessment of the I-215 off-ramps at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard to ensure there is no queuing, or back-up, onto the freeway mainline. These I-215 off-ramps were selected because the Project is anticipated to contribute 50 or more peak hour trips to these off-ramp intersections, consistent with the March JPA Guidelines. The 2022 Traffic Analysis performed a queuing analysis for these I-215 Freeway off-ramps for all scenarios (Existing [2021], Existing plus Project, Existing plus Ambient Growth plus Project, Opening Year [2028] Cumulative Without Project, Opening Year [2028] With Project, Horizon Year [2045] Without Project, and Horizon Year [2045] With Project). Based on the results of this queuing analysis, there are no study area off-ramps that are anticipated to experience queuing issues under any scenario. Caltrans is one of the state reviewing agencies for the Project, and had the opportunity to comment on the transportation analysis. https://ceqanet.opr.ca.gov/2021110304. Caltrans did not submit any comments on this Project. (Appendix N-3)

To improve regional operational conditions, Caltrans, in conjunction with the Riverside County Transportation Commission, has completed a number of I-215 Freeway regional improvement projects. The I-215 Freeway South project widened I-215 to provide an additional general-purpose lane in each direction between Murrieta Hot Springs Road and Scott Road. The I-215 Central project widened I-215 to provide an additional general-purpose lane in each direction between Scott Road and Nuevo Road. The latest improvement along the I-215 Freeway corridor is the new interchange at Placentia Avenue that was completed in late 2022. A future planned I-215 Freeway North project proposes to add one carpool lane in each direction of travel between Nuevo Road and the SR-60 Freeway in addition to implementing a new westbound auxiliary lane to improve traffic merging

with the SR-60 Freeway. Another regional facility is the Mid-County Parkway (MCP) which is an east-west transportation corridor generally running along the alignment of Ramona Expressway. The first phase of the MCP includes the recently completed Placentia Avenue interchange at the I-215 Freeway and the second phase is currently under design and is anticipated to go into construction in 2025. The second phase of the MCP project will construct an additional lane in each direction (in addition to other design features along the corridor) between Pico Avenue and Warren Road along Ramona Expressway. (Appendix N-3)

To address identified intersection/roadway segment deficiencies, Table 1-4 of the 2022 Traffic Analysis recommends off-site improvements and the Project's fair share contribution thereto and PDF-TRA-4 requires payment. For each analyzed scenario, the 2022 Traffic Analysis discloses conditions "Without Improvements" and conditions "With Improvements." (Appendix N-3)

PM-43. Adam Collier
February 8, 2023

PM-43.1 This comment advertises a community meeting on February 9, 2023. This comment does not raise any specific issues or concerns about the adequacy of the environmental analysis included in the Draft EIR. As such, no further response is provided.

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